

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-63				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name UIC Program:   MIT Document				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.2, 2.2.7, 2.3					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2019   To   06/30/2020				
Comments:										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
09/01/2015 To 06/30/2020										
This Action:						663				
Total:						663				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name   Suzanne Kelly  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-564-3887 FAX Number:				
Project Officer Name   Nancy Parrotta  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name   Camille W. Davis  <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> <span>(Signature)</span> <span>(Date)</span> </div>						Branch/Mail Code: Phone Number: 513-487-2095 FAX Number: 513-487-2115				

# **PERFORMANCE WORK STATEMENT**

**EP-C-15-022**

**Work Assignment 4-63**

**July 1, 2019 to June 30, 2020**

## **I. ADMINISTRATIVE:**

**A. Title:** UIC Program Support for Mechanical Integrity Testing Document Revisions

**B. Work Assignment Contracting  
Officer's Representative (WACOR):**

**Alternate Work Assignment Contracting  
Officer's Representative (WACOR):**

Suzanne Kelly  
Office of Ground Water and Drinking  
Water (OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-3887  
kelly.suzanne@epa.gov

## **C. Quality Assurance:**

The tasks in this work assignment do not require environmental measurements. Consistent with the Agency's quality assurance (QA) requirements, the contractor does not need to supplement the Contract Level Quality Assurance Project Plan (QAPP) or to prepare a Project-Specific Quality Assurance Project Plan (PQAPP).

## **D. Background:**

The Environmental Protection Agency (EPA), as authorized by the Safe Drinking Water Act, establishes minimum federal requirements for Underground Injection Control (UIC) programs for the protection of underground sources of drinking water (USDWs). The UIC Program is responsible for permitting the construction, operation, monitoring, reporting and closure of the injection wells in a manner necessary to protect USDWs.

The Underground Injection Control (UIC) Program managers in EPA Headquarters and Regions identified that there is an urgent need to update the Mechanical Integrity Testing Document (MIT) which was last revised in 1982. MIT tests are used by the UIC Program to ensure that injection wells, and the mechanical components of the injection wells, are functioning properly in a manner that is protective of underground sources of drinking water (USDW). MIT tests are used to verify that leaks are not occurring in the internal parts (casing, packer and tubing) of an injection well. They are also used to verify that fluid is not moving externally, such as between or into USDWs through channels adjacent to the borehole. Endangerment of USDWs can occur when injection activities cause the movement of fluid into a USDW. EPA's UIC Program routinely uses MIT tests to verify that injection wells are operating properly and that no unintended fluid movement is



occurring. The tasks under this work assignment support the Agency's goal of protecting USDWs.

## **II. OBJECTIVE:**

The contractor shall provide support to EPA in revising the Agency's 1982 Mechanical Integrity Testing document. The intended audience for this project is UIC Program technical staff in EPA Regions and Headquarters.

This work will be completed commensurate with Sections 2.2, 2.2.7, and 2.3 of the Contract Level PWS.

LOE: 663 Hours

## **III. TASK DETAIL:**

The contractor shall perform the following tasks:

### **Task 0: Work Plan Submission**

The contractor shall prepare a detailed work plan and budget for the accomplishment of the indicated tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff; (b) the number of hours and labor classifications proposed for each task, broken down to task level, to include both prime contractor and subcontractor labor; and (c) a list of deliverables, with due dates and schedule for deliverables. In addition, the contractor shall prepare a statement indicating that this WA is a continuation of WA 3-63.

If subcontractor(s) is proposed and subcontractors are outside of the local metropolitan area, the contractor shall include information on plans to manage the work and contract costs. In addition, the work plan shall specify that a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract QAPP or a PQAPP is not required.

At this time no events, meetings, or trainings are anticipated for this work assignment. However, the Contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the Contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

### Deliverables:

- Work plan and budget
- Monthly progress reports.

**Task 1: Provide comment support on charge questions for the Revised MIT Document**

During the previous work assignment, a list of charge questions was developed for reviewers of the MIT document. During the performance period of this work assignment, it is anticipated that EPA may receive Regional comments on the charge questions. Upon receipt of technical direction from the EPA WACOR, the contractor shall provide recommendations for resolving Regional comments (text revisions/edits) to the EPA WACOR for review and comment. For estimation purposes, the contractor shall anticipate EPA may receive up to 10 technical comments over the course of the performance period for this WA. The Contractor shall deliver recommendations on how to address these comments within two weeks of receipt of technical direction from the EPA WACOR.

**Deliverable:**

- Within two weeks of receiving technical direction from the EPA WACOR, the Contractor shall propose revised edits to address the comments in WORD format to the EPA WACOR for review and comment.

**Task 2: Provide comment support on the Proposed Outline for the Revised MIT Document**

During the previous work assignment, a proposed outline was developed with the goal of modernizing the 1982 MIT document. During the performance period of this work assignment, it is anticipated that EPA may receive Regional comments on the proposed revised outline. Upon receipt of technical direction from the EPA WACOR, the contractor shall provide recommendations for resolving these comments (text revisions/edits) to the EPA WACOR for review and comment. For estimation purposes, the Contractor shall anticipate EPA may receive up to 20 technical comments over the course of the performance period for this WA. The contractor shall deliver recommendations on how to address these comments within two weeks of receipt of technical direction from the EPA WACOR.

**Deliverable:**

- Within two weeks of receiving technical direction from the EPA WACOR, the Contractor shall propose revised edits to the draft revised outline to address the comments in WORD format to the EPA WACOR for review and comment.

**Task 3: Review and Revise Red-line strikeouts of the 1982 MIT Publication**

Upon receipt of technical direction from the EPA WACOR, and in collaboration with EPA, the contractor shall review feedback provided via the charge questions (Task 1) and proposed outline (Task 2) to identify if any new revisions, edits or red-line strikeouts or graphics are needed to update the redlined 1982 MIT document developed during the previous performance period. For estimation purposes, the Contractor shall anticipate the following types of edits:

- Provide background information on MIT testing including the different types of tests and tools available for use for Class I-VI well classes.
- Explain the two parts of a MIT test.
- Explain in which scenarios certain MIT tests should or should not be used.
- Confirm that the existing citations are relevant and if not, suggest edits to correct citation.
- Explain how to evaluate and interpret MIT test results/reports.

- Confirm that the cost information providing in the publication are still relevant and if not, suggest edits to correct the cost information.
- Determine which graphics and/or figures are illegible or difficult to understand and suggest revisions.
- Identify any other obsolete information or analyses referenced in the document.
- Identify any other current or relevant MIT information that should be included in the document.
- Suggest draft report templates for the appendix.

The contractor shall deliver a revised redline strikeout of the MIT guidance with draft graphics incorporated in WORD format to the EPA WACOR for review and comment within 4 weeks of receipt of technical direction from the EPA WACOR. Upon receipt of technical direction from EPA WACOR, the Contractor shall finalize the redline strikeout within 10 business days of receipt of comments from the EPA WACOR

Deliverables:

- Within 3 weeks of receiving technical direction from EPA WACOR, the Contractor shall deliver a revised red-line strikeout of the MIT guidance with draft graphics incorporated in WORD format to the EPA WACOR for review and comment.
- Upon receipt of technical direction from EPA WACOR, the Contractor shall finalize the redline strikeout within 10 business days of receipt of comments from the EPA WACOR.

**Task 4: Develop a draft educational script and e-learning module on MIT UIC basics**

Upon receipt of technical direction from the EPA WACOR, the contractor shall develop a draft educational storyboard script with illustrations and graphics in WORD format to describe MIT basics as they relate to the UIC program. Where feasible the Contractor should leverage existing EPA illustrations and animations for use in the script and if not feasible identify for the EPA WACOR which graphics and/or illustrations that need to be developed. For estimation, the Contractor shall anticipate the storyboard script outline will contain the following:

- Background/Overview of MIT testing – including the different types of tests and tools available for use for Class I-VI well classes.
- Internal vs. External Mechanical Integrity
- MIT and UIC Program Requirements
- Testing for Mechanical Integrity
- Visual depiction of tests that can demonstrate internal and/or external Mechanical Integrity

The draft storyboard script shall be delivered in an electronic WORD format to the EPA WACOR for review and comment no more than 4 weeks after receipt of technical direction from the EPA WACOR. For purposes of estimation, the storyboard will be approximately 6-10 pages in length. Upon receipt of technical direction from the EPA WACOR, the Contractor shall finalize the storyboard script within 2 weeks after receipt of comments from the EPA WACOR.

Upon receipt of technical direction from the EPA WACOR, the Contractor shall use the final storyboard script to build a draft MIT training module in Captivate 9 no more than 4 weeks after

receipt of technical direction from the EPA WACOR. All online training will be scorm compliant and will be developed using software that can easily be migrated to the EPA's Learning Management System.

Deliverables:

- Within 4 weeks of receiving technical direction from the EPA WACOR, the Contractor shall deliver a draft storyboard script in WORD format to the EPA WACOR for review and comment.
- Upon receipt of technical direction from the WACOR, the contractor shall finalize the storyboard script within 2 weeks of receiving comments from the EPA WACOR.
- Within 6 weeks of receiving technical direction from the EPA WACOR, the Contractor shall deliver a draft MIT module in Captivate 9 format to the EPA WACOR for review and comment.

**IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>Task 0: Work Plan and Monthly Progress Reports</b>		
	Work plan and Budget	According to contract
	Monthly progress reports	Monthly
<b>Task 1: Provide Comment Support on Charge Questions for the Revised MIT Document</b>		
	Suggested revisions/edits to address comments	Within 2 weeks of receiving technical direction from the EPA WACOR
<b>Task 2: Provide Comment Support on Proposed Outline for the Revised MIT Document</b>		
	Suggested revisions/edits to address comments	Within 2 weeks of receiving technical direction from the EPA WACOR
<b>Task 3: Review and Revise Red-line strikeout of the 1982 MIT Publication</b>		
	Draft red line strikeout of MIT document	Within 4 weeks of receiving technical direction from the EPA WACOR
	Final redline strikeout of MIT document	Within 10 business days of receiving comments from the EPA WACOR
<b>Task 4: Develop a draft educational script and e-learning module on MIT UIC basics</b>		
	Draft storyboard script in WORD format	Within 4 weeks of receipt of technical direction from the EPA WACOR
	Finalize storyboard script in WORD format	Within 2 weeks of receipt of technical direction from the EPA WACOR
	Draft MIT Training Module in Captivate 9	Within 6 weeks of receipt of technical direction

		from the EPA WACOR
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## **V. MISCELLANEOUS**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. TECHNICAL DIRECTION**

The CLCOR or WACOR is permitted to provide technical direction. Technical direction must be within the scope of the WA PWS and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

## **VII. TRAVEL**

The contractor shall not anticipate any travel associated with this WA over the duration of the performance period.

## **VIII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

## **IX. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## **X. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

**XI. QUALITY ASSURANCE AND SURVEILLANCE PLAN (QASP)**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-63				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2020			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number                      4			UIC Program: MIT Document				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.2, 2.2.7, 2.3					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From 07/01/2019 To 06/30/2020					
Comments: The purpose of this amendment 1 to Cadmus (EP-C-15-022) WA 4-63 is to change the WACOR to Kyle Carey.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
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4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 663				
09/01/2015 To 06/30/2020										
This Action:						0				
Total:						663				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name    Kyle Carey						Branch/Mail Code:				
						Phone Number: 202-564-2322				
_____ (Signature)                      (Date)						FAX Number:				
Project Officer Name    Nancy Parrotta						Branch/Mail Code:				
						Phone Number: 202-564-5260				
_____ (Signature)                      (Date)						FAX Number:				
Other Agency Official Name						Branch/Mail Code:				
						Phone Number:				
_____ (Signature)                      (Date)						FAX Number:				
Contracting Official Name    Camille W. Davis						Branch/Mail Code:				
						Phone Number: 513-487-2095				
_____ (Signature)                      (Date)						FAX Number: 513-487-2115				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-70				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Aquifer Exemption Data Initiat				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.2, 2.3, 4.3, 6.1, 6.2, 6.3, 7.4					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   07/01/2019   To   06/30/2020					
Comments:										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/01/2015   To   06/30/2020				0						
This Action:				313						
Total:				313						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name    Jill Dean  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-8241 FAX Number:				
Project Officer Name    Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name    Camille W. Davis  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2095 FAX Number: 513-487-2115				



## **PERFORMANCE WORK STATEMENT**

**Cadmus EP-C-15-022**

**Work Assignment No. 4-70**

**July 1, 2019 – June 30, 2020**

### **I. ADMINISTRATIVE:**

#### **A. Title: Aquifer Exemption Data Initiative**

#### **B. Work Assignment Contracting Officer's Representative (WACOR):**

Jill Dean  
US EPA Headquarters  
OGWDW (4606M)  
1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Office: 202-564-8241  
Fax: 202-564-3756  
E-mail: dean.jill@epa.gov

#### **Alternate WACOR:**

#### **C. Quality Assurance:**

Tasks 2 and 3 in this Work Assignment (WA) require the use of primary and/or secondary data. Consistent with the Agency's Quality Assurance (QA) requirements, the contractor must prepare a complete Project Specific Quality Assurance Project Plan (PQAPP), to assure the quality of the data used under this WA. Work on these tasks cannot proceed until the contractor receives notification of PQAPP approval from the Contract Level Contracting Officers Representative (CL-COR) via email. The QA requirements must be addressed in the monthly progress reports as specified under Task 0 below.

Additional information on the PQAPP is described in the Task 1.

#### **D. Background:**

The Underground Injection Control (UIC) program has collected national aquifer exemption data in Environmental Protection Agency (EPA) Headquarters. The UIC program requirements are found in the Code of Federal Regulations (CFR) at 40 CFR Parts

144, 146 and 148. The requirements of concern in this work assignment are requests for aquifer exemptions and the supporting underlying data. An aquifer exemption is an aquifer or a portion thereof which meets the criteria for an “underground source of drinking water” (USDW) as laid out in 40 CFR 146.3 and may be determined under 40 CFR 144.7 to be an exempted aquifer if it meets the criteria of 40 CFR 146.4 (a), (b), (c) and (d). Briefly, in order for aquifers (USDWs) to be removed from UIC program protection, they must not serve as a drinking water source now or in the future based on criteria listed in 40 CFR 146.4 (a), (b) 1-4, and (c); the total dissolved solids must be greater than 3,000 and less than 10,000 mg/L; and the aquifer is not reasonably expected to supply a public water system. Most aquifer exemption requests are usually associated with an injection well permit and are considered a UIC program revision. Aquifer exemption requests are generally managed at the EPA regional and state level, however, there are instances where EPA Headquarters gets involved in the process, namely because some aquifer exemption requests are considered major program revisions. Owners/operators (o/o) of injection wells wishing to exempt underground sources of drinking water (USDW) for purposes associated with underground injection projects may submit an aquifer exemption request or application to the regulatory agency for review. If the regulatory agency is a delegated state UIC program, it can review the application and make a determination that it is technically sound and submit its recommendation for approval to EPA. Only EPA can approve aquifer exemptions. In the case of a Direct Implementation state (States without the UIC program delegation are run by EPA Regions.), the o/o submits the aquifer exemption application directly to the EPA region for review and approval.

## **II. OBJECTIVE:**

EPA maintains aquifer exemptions data at Headquarters. The contractor shall provide technical support to EPA for the Aquifer Exemption Data Initiative to update the current aquifer exemptions dataset with new information. Technical support may include collecting aquifer exemption data from the EPA Regions, communicating with the EPA Regions to ensure accurate interpretation of the data, performing quality control/assurance procedures, and finalizing the aquifer exemption data in an Excel spreadsheet and geospatial information system (GIS) file. Additionally, the contractor shall provide documentation of methodology and decisions as well as metadata for the geospatial data.

The contractor shall provide technical and general support per technical direction only from the WACOR or alternate WACOR for the Aquifer Exemption Data Initiative.

This work will be completed commensurate with Sections 2.2, 2.3, 4.3, 6.1, 6.2, 6.3, and 7.4 of the Contract Level PWS. The level of effort estimated for this work assignment is three hundred thirteen (313) hours.

## **III. TASK DETAIL:**

The contractor shall perform the following tasks:

**Task 0 – Work Plan, Weekly Conference Calls, and Monthly Progress Reports Submission**

In accordance with contract requirements, the contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, and the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. For planning purposes, the work plan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables that will be publicly released be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

Weekly conference calls between the WACOR and contractors are expected to communicate work progress and address any challenges that arise. For planning purposes, no more than two (2) contractor staff should attend the weekly conference calls. Weekly calls are expected to be no more than one (1) hour in duration.

This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in the WA.

Deliverables: Work plan and monthly progress and financial reports

**Task 1 – Project-Specific Quality Assurance Project Plan**

Tasks in this WA 4-70 are a continuation of work conducted under WA 0-70, WA 1-70, WA 2-70, and WA 3-70. The contractor shall update, as needed, the existing PQAPP completed under WA 0-70, as noted in section C Quality Assurance, and ensure the quality of secondary data used to complete these tasks. The PQAPP should reflect the QA procedures that the contractor shall take to assure project quality. The contractor shall write the PQAPP using the active voice. The text of the PQAPP must explicitly reference tools that the contractor shall use to document and review reproducibility and traceability, such as standard operating procedures, check lists, and guidelines. The PQAPP must include the tools as attachments for EPA's review and approval. The contractor shall perform work under this performance work statement in a manner consistent with the PQAPP. In addition, the contractor shall document relevant QA activities in any deliverable.

Quality assurance and metadata support for geospatial files should adhere to EPA approved geospatial procedures and standards found at <https://www.epa.gov/geospatial/geospatial-policies-and-standards>.

Deliverable: PQAPP

## **Task 2 – Data Update and Quality Assurance**

The contractor shall add aquifer exemption data collected from the EPA Regions to a spreadsheet, communicate with Regional staff to ensure accurate interpretation of the data, perform quality control/assurance procedures, update the appropriate quality assurance (QA) fields in the spreadsheet, and finalize the aquifer exemption spreadsheet. The aquifer exemption spreadsheet includes approximately four thousand (4,000) rows of data with around twenty (20) data fields. The WACOR will provide the contractor with a current version of the data. The information provided to the contractor by the WACOR may be in hardcopy maps, Excel spreadsheets, Access databases, or portable data file (PDF) format.

New data may come from multiple EPA Regions. California and EPA Region 8 have both existing and new aquifer exemptions that will need to be updated. We expect an especially large number of aquifer exemption data to come from Region 6 where the Texas Railroad Commission is improving its records on aquifer exemptions approved at program primacy. It may be necessary to work with Commission staff to prioritize the records added to the aquifer exemption spreadsheet. Prioritization may be based on the number of injection wells within the aquifer exemption boundaries. The data or a portion of the data may already be in spreadsheet format, which would require the contractor to assess the data quality and incorporate the data into the existing EPA geospatial and spreadsheet files. For planning purposes, the contractor shall assume new data for up to three thousand (3,000) approved aquifer exemptions and an update to data for up to five hundred (500) existing records for the WA period.

For this performance period, the Aquifer Exemption Map is expected to be updated with the Texas aquifer exemptions in July 2019. The national dataset is typically updated in January or February of each year. The Texas aquifer exemptions will be included in all future updates of the national dataset. The timing of discussions and data transfer from the Texas Railroad Commission resulted in two updates to the Aquifer Exemption Map during this performance period.

Any data that do not meet acceptance criteria prescribed by the PQAPP shall be identified to the WACOR in a memorandum with an explanation of the quality issue. For planning purposes, up to ten (10) memorandums describing data quality issues and either proposed or actual resolution of the issues may be needed. Resolution may include changes to database structure that improve communications, exclusion of data that does not meet quality criteria described in the PQAPP, or corrections to data elements. It may be necessary for the contractor, upon request from the WACOR, to contact specific EPA Regional staff to clarify or update some data in order to meet quality acceptance criteria.

The contractor shall provide the WACOR with draft versions of the spreadsheet, as needed, in order to facilitate decisions about data management and clarifications requested of Regional staff. After QA processes conclude, the contractor shall provide the

WACOR with a final version of the spreadsheet that includes the updated aquifer exemptions data. The deliverable date for final data will be dependent on the work needed to correct any issues. For planning purposes, final data will be due between two (2) weeks and one (1) month after WACOR comments are provided on draft data.

Deliverables: QA issue memorandums, draft and final versions of datasets

### **Task 3 – Geospatial File Development**

Geospatial file development will proceed concurrently with updates to the aquifer exemption spreadsheet described in Task 2. The contractor shall pair selected data elements from the spreadsheet with point and polygon locations for the exempted aquifers developed in Environmental Systems Research Institute (ESRI) ArcGIS 10.4 or higher. The contractor shall identify whether individual records meet QA criteria using flag fields. The contractor shall provide the WACOR with a subset of the data that meets QA criteria; rows with insufficient, inaccurate, contradictory, or otherwise invalid location information will be excluded. The subset of data will include identifying information for each exempted aquifer; locational information such as county, state, tribe, latitude and longitude of the centroid for each exempted aquifer; the injection well class associated with the aquifer exemption; the exemption area; depth of the exempted aquifer; lithology; approval date; and injectate characteristics. The subset of data shall be appropriate for separate analysis in ESRI ArcGIS 10.4 or higher.

Aquifer exemption locations from the Texas Railroad Commission will likely be supplied in geodatabases, which would require the contractor to assess the data quality and incorporate the data into the existing EPA geospatial files. For planning purposes, the contractor shall assume new data for up to three thousand (3,000) approved aquifer exemptions. It may be necessary to work with Commission staff to prioritize the records added to the aquifer exemption file. Prioritization may be based on the number of injection wells within the aquifer exemption boundaries.

For this performance period, the Aquifer Exemption Map is expected to be updated with the Texas aquifer exemptions in July 2019. The national dataset is typically updated in January or February of each year. The Texas aquifer exemptions will be included in all future updates of the national dataset. The timing of discussions and data transfer from the Texas Railroad Commission resulted in two updates to the Aquifer Exemption Map during this performance period.

Geospatial data will be displayed on the EPA's Geoplatform. Online publication of maps should leverage the Geoplatform technical architecture (hardware and software) to the fullest extent possible for public search and discovery. The contractor shall upload data to the Geoplatform and prepare the map layers and application for public release. The contractor shall follow Geoplatform policies and publication procedures. The OW geospatial administrator and communications director must approve all new maps hosted on the Geoplatform prior to production release.

The contractor shall prepare metadata for the geospatial file using the EPA Metadata Editor (EME; for more information on the EPA Metadata Editor, please see <https://edg.epa.gov/metadata/catalog/main/home.page>.) For planning purposes, the data file destined for the EPA Geoplatform will include up to fifteen data fields and up to eight thousand (8,000) rows of data. All fields will be completed to the contractor's best knowledge with input from the WACOR, including optional fields. The final metadata will be validated using EME's validation tool and provided in XML and HTML formats. All geospatial metadata will be published in EPA's Environmental Data Gateway, which serves Data.gov as an Office of Management and Budget (OMB) requirement. Information on metadata and the Environmental Data Gateway may be found at <https://edg.epa.gov/metadata/catalog/main/home.page>.

Deliverables: geospatial file; metadata for geospatial file

#### **Task 4 – Communication Materials**

The contractor shall convert up to ten (10) individual communication materials to be 508 compliant upon request by the WACOR. For planning purposes, the materials may include fact sheets (up to three pages each), graphic files in JPG or PDF format such as maps, or text documents (up to ten pages each).

Deliverables: 508-compliant documents

#### **IV. Schedule of Deliverables:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
0	Work Plan	Within fifteen (15) calendar days of receipt of work assignment
	Monthly progress and financial reports	Monthly
	Conference call to discuss project progress	Weekly
1	PQAPP update	Within fifteen (15) days of issuance of work assignment
2	Data quality issue memorandums	As requested by WACOR
	Draft dataset	As requested by WACOR
	Dataset including Texas	By July 31, 2019

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
	Final national dataset	By December 31, 2019
3	Geospatial file including Texas	By July 31, 2019
	Metadata for geospatial file including Texas	By July 31, 2019
	Final national geospatial file	By January 10, 2020
	Metadata for geospatial dataset	By January 10, 2020
4	508-compliant documents	As requested by WACOR

## **V. Miscellaneous**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred GIS format:	ESRI ArcGIS, version 10.4 or higher

## **VI. Travel**

The contractor should anticipate only local travel, if necessary, in support of this WA over the duration of the performance period.

## **VII. Meetings, Conferences, Training Events, Award Ceremonies, and Receptions**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

### **VIII. Contractor Identification**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

### **IX. Printing**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

### **X. Quality Assurance Surveillance Plan**

All task(s) identified in the performance work statement above are subject to review and approval by the WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, schedule, and document development standards.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-90				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Reg 9 Support for UIC Program				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.1, 2.1.1, 2.1.2, 2.2, 2.2.7, 4.3, 4.3.2, 4.3.6,					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   07/01/2019   To   06/30/2020					
Comments: Add'l PWS Paragraphs:   8.1, 8.1.1, 7.2.4, 8.3, 8.3.2, 8.3.6, 8.3.8, 8.3.9, 8.3.12, 8.3.13										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations data use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE: 0					
09/01/2015 To 06/30/2020										
This Action:					1,755					
Total:					1,755					
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name   Kate Rao							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 415-972-3533			
							FAX Number:			
Project Officer Name   Nancy Parrotta							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-5260			
							FAX Number:			
Other Agency Official Name   Lisa Mitchell-Flinn							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 513-487-2852			
							FAX Number:			
Contracting Official Name   Camille W. Davis							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 513-487-2095			
							FAX Number: 513-487-2115			

## **PERFORMANCE WORK STATEMENT**

**Contract: EP-C-15-022**

**Work Assignment No. 4-90**

**Period of Performance: 7/1/19-6/30/20**

### **I. ADMINISTRATIVE**

#### **A. Title: Regions 9 and 10 Technical Support for Implementation of the Underground Injection Control (UIC) Program, and Navajo Nation UIC Program**

##### **B. Work Assignment Manager:**

Kate Rao  
Drinking Water Protection Section  
USEPA Region 9  
75 Hawthorne Street  
Mail Code: WTR 3-2  
San Francisco, CA 94105  
Email: rao.kate@epa.gov  
Phone: 415.972.3533  
Fax: 415.947.3549

##### **Alternate (as applicable)**

Leslie Greenberg  
Drinking Water Protection Section  
USEPA Region 9  
75 Hawthorne Street  
Mail Code: WTR 3-2  
San Francisco, CA 94105  
Email: greenberg.leslie@epa.gov  
Phone: 415.972.3349  
Fax: 415.947.3549

##### **C. Estimated LOE: 1755**

##### **D. Quality Assurance:**

Tasks 1 - 6 in this work assignment require the use of primary and/or secondary data. Collection, use and analysis of data will be identical to the procedures described in the Supplemental Project Specific Quality Assurance Project Plan (SQAPP) completed under Task 0 of WA 0-90, consistent with the Agency's quality assurance (QA) requirements, appending the Contract Level Quality Assurance Project Plan (QAPP). The project specific quality assurance requirements must be addressed in the monthly progress reports as specified under Task 0, below.

##### **E. Background:**

The Safe Drinking Water Act requires the U.S. EPA to regulate underground injection of fluids through wells to protect the quality of underground sources of drinking water. This is done in part by issuing Underground Injection Control (UIC) Program permits to owners of injection wells. The UIC Program divides injection wells into six classes. The six classes are based on similarity in the fluids injected, activities, construction, injection depth, design, and operating techniques. This categorization ensures that wells with common design and operating techniques are required to meet appropriate performance criteria for protecting underground sources of drinking water (USDWs). Class I wells inject hazardous wastes, industrial non-hazardous liquids, or municipal wastewater beneath the lowermost USDW. Class II wells inject brines and other fluids associated with oil and gas production, and hydrocarbons for storage. They inject into either Class II Exempt Aquifers or into saline aquifers that are beneath the lowermost USDW. Class III wells inject fluids associated with solution mining of minerals into either Class III Exempt Aquifers or into saline aquifers that are beneath the lowermost USDW. Class IV wells inject hazardous or radioactive wastes into or above USDWs and are banned unless authorized under a federal or state ground water remediation project. Class V wells include all injection wells not included in Classes I-IV or VI. In general, Class V wells inject non-hazardous fluids into or above USDWs and are typically shallow, on-site disposal systems. However, there are some deep Class V wells that inject below USDWs. Class VI wells inject carbon dioxide captured from an industrial source into deep subsurface rock formations for long-term storage.

EPA utilizes contractor support to evaluate Class I, II, III, V, and VI Underground Injection Control permit applications, draft documents for proposed permit actions, provide technical assistance for permit

implementation activities, conduct special studies and project technical reviews as directed and provide direct consultation to Regions 9, 10 or Navajo Nation UIC staff. Some application material may contain confidential business information (CBI). If CBI is noted, the WACOR will properly provide a notice of contemplated disclosure of CBI to the applicant pursuant to 40 CFR Part 2, Sections 301 and 304, prior to providing the contractor the necessary technical direction for a given task under this WA.

## **II. OBJECTIVE**

The contractor shall conduct the timely evaluation of approximately six (6) Underground Injection Control Permit Applications to determine administrative and technical completeness, support the development of documents for approximately four (4) proposed draft and final permit actions, provide technical assistance up to 10 hours per month for permit implementation activities, conduct 8 - 10 special studies or project technical reviews, provide up to 16 hours/month of consultation (on an as-needed, periodic basis) and up to 10 hours/month of technical review permit application training (on an as-needed, periodic basis) to Regions 9 and 10 or Navajo Nation UIC staff. All of these actions pertain to the identification and protection of USDWs.

## **III. TASK DETAIL**

The contractor shall perform the following tasks:

### **Task 0: Work Plan and Monthly Progress Reports**

The contractor shall prepare a detailed work plan and budget for the accomplishment of the indicated tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff; (b) the number of hours and labor classifications proposed for each task, broken down to task level, to include both prime contractor and subcontractor labor; and (c) a list of deliverables, with due dates and schedule for deliverables.

In addition, the contractor shall prepare a statement indicating that this WA is a continuation of WA 3-90. The workplan shall explain that collection, use and analysis of data in this work assignment will be identical to the procedures described in the SQAPP completed under Task 0 of WA 0-90.

This task also includes monthly progress and financial reports which are to be submitted pursuant to Attachment 2 of the contract. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in this WA. The contractor shall immediately notify the Contract Level COR and WACOR if any changes to the tasks involving the collection and analysis of the data occur and prepare a new supplemental to the SQAPP accordingly. Work on these tasks cannot proceed until the contractor receives notification of the new SQAPP approval from the Contract Level COR via e-mail.

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

The contractor shall immediately alert the WA COR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

### **Task 1: UIC Permit Application Review (PWS Area: 4, 4.3, 8, 8.3)**

The contractor shall evaluate (approximately 6) UIC Permit Applications submitted to US EPA Region 9 or 10 for Class I, II, III, V, or VI injection wells. The contractor shall evaluate the applications for administrative and/or technical completeness as noted below:

#### **Subtask 1.1: Administrative Completeness**

(a) administrative completeness per the requirements of 40 CFR part 144, (b) adherence to the minimum federal regulatory permit requirements standards at 40 CFR 144, 145, 146, and 147, c) identification of any substantive issues of concern for the proposed construction and operation of the injection wells, and d) overall accuracy and clarity of the application (i.e. any data gaps).

The contractor shall prepare a summary report (approximately 10 pages) of the proposed injection application/project with a determination of administrative completeness and a preliminary assessment of key issues to be addressed in the technical review phase. If the application is incomplete, the contractor shall include in the report a list of outstanding items necessary to make the application complete. The contractor shall submit the draft summary report to the EPA WACOR for review and comment. Upon receipt of comments from the EPA WACOR, the contractor shall finalize the summary report. If the contractor determines that the permit application is deficient, the contractor shall evaluate subsequent submittals as needed for administrative completeness until the application is deemed administratively complete.

#### **Subtask 1.2: Technical Review Analysis**

(a) analysis of any well log data and testing results submitted by permit operators, (b) an evaluation of local and regional geology, including receiving formation and confining zone characteristics, (c) area of review (AoR) determinations and zone of endangering influence calculations, (d) recommendations for any corrective action required at existing wells within the AOR, (e) identifications of technical terms and conditions to be imposed in the draft permit – operational, monitoring, testing, reporting, etc., (f) evaluation of plugging and abandonment plans and acceptability of financial assurance, (g) an evaluation of seismic hazards and recommendation for suggested permit conditions if needed, and (h) review and evaluation of any and all other applicable attachment(s) in the application or information submitted in support of the permit application.

The contractor shall submit the draft permit analysis report (approximately 20 pages) to the EPA WACOR for review and comment. The contractor shall include in the report an itemized list of additional information needed to clarify, modify, or supplement the application materials to address technical deficiencies. Upon receipt of comments from the EPA WACOR, the contractor shall finalize the report. If the contractor or EPA determines deficiencies in the technical review analysis, the contractor may be asked to evaluate subsequent submittals as needed until the permit application is technically sufficient.

### **Task 2: Permit Process Support (PWS Area: 4, 4.3, 8, 8.3)**

The contractor shall provide support to approximately four (4) proposed UIC permit actions for Class I, II, III, V, or VI injection wells. The contractor may be requested to develop some or all of the following subtasks:

#### **Subtask 2.1: Statement of Basis/Fact Sheet**

The contractor shall prepare a statement of basis/fact sheet document for proposed UIC permit actions. The statement of basis/fact sheet shall adhere to the requirements outlined in 40 CFR 124.7 and 124.8 and shall briefly set forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit. It is anticipated that the statement of basis or fact sheet shall be approximately 4-8 pages in length, and shall be developed for the purpose of explaining to the

public the rationale for EPA's proposal to issue the specific permit as drafted. The contractor shall submit the statement of basis/fact sheet to the EPA WACOR for review and comment. Upon the receipt of comments by the EPA WACOR, the contractor shall finalize the document.

#### **Subtask 2.2: Public Notification Document Development**

The contractor shall prepare public notification (PN) documents, regarding the proposed UIC Permit. The public notification document shall be prepared in accordance with guidance provided by the EPA WACOR. It is anticipated that each document shall be approximately 1-3 pages in length. The contractor shall submit a draft of the public notification document to the EPA WACOR for review and comment. Upon the receipt of comments, the contractor shall finalize the document.

#### **Subtask 2.3: Public Meetings Hearings Support, and/or Permit Appeals**

The contractor shall develop at the direction of the EPA WACOR support material(s) for EPA to use at up to three public informational meetings, hearings, or permit appeal processes. Contractor may also be asked to participate at a public informational meeting, public hearing(s), and/or permit appeal process(es). We anticipate non-local travel for one individual (SME) to two public events. The locations and dates are not known at this time. We anticipate travel support will be associated with 1) Class III permit in Arizona and 2) a Class II permit in Idaho. 2-3 days of total travel, including travel time and prep, is anticipated for each event.

#### **Subtask 2.4: Public Comment Review and Response to Comments Development**

The contractor shall review public comments submitted, or a specific portion of them, and prepare a response to comments document, summarizing comments received, responding to comments submitted and specify any recommended changes to the draft permit and the reason for change, as described in 40 CFR 124.17. The format to be used will be provided by the EPA WACOR. The contractor shall use, to the extent available as provided by the EPA WACOR, as appropriate, standard EPA Region 9 or 10 responses to common issues/comments. If commenters raise significant policy issues, the contractor will identify those with notation in the draft response to comments document. EPA Region 9 or 10, will take the lead from that point to resolve those issues with the commenter(s) and then provide guidance to the contractor regarding the approach to be taken in finalizing a response to the particular issues raised. As necessary, and prior to the delivery of the final response to comments document, the contractor shall contact the EPA WACOR where guidance is needed regarding the approach to be taken in addressing certain comments in the response to comments document. The contractor shall submit a draft of the response to comments document to the EPA WACOR, for review and comment. The contractor shall revise the document based on the EPA comments received and provide a final copy to the EPA WACOR to approve.

#### **Task 3: Permit Implementation Support (PWS Area: 2, 2.2, 8, 8.3)**

The contractor shall provide support once a permit is issued, including review of drilling plans, logs, pressure transient tests and other technical submittals as required by the terms and conditions of the permit. We anticipate minimal effort for this task.

#### **Task 4: Special Studies and Project Technical Reviews (PWS Area: 2, 2.1, 2.2, 8, 8.3)**

The contractor shall develop 8 - 10 special studies and/or project technical reviews as requested and detailed by the EPA WACOR through written technical direction. These studies or reviews will pertain to protection of USDWs or compliance with the Permit under the Safe Drinking Water Act. For these special studies or project technical reviews, the contractor shall prepare a draft report or technical memorandum (typically 5-10 pages in length) for each study/review performed, summarizing the results of the review and recommendations for EPA or Navajo Nation EPA consideration, and opportunity to review and comment. The contractor shall incorporate any comments from EPA and/or Navajo Nation EPA and will provide a final draft of each study or review to the EPA WACOR.

#### **Task 5: Consultation Support (PWS Area: 2, 4, 8)**

Upon the receipt of written technical direction by the EPA WACOR, the contractor shall make one (1) staff person available to provide consultation support for: a) evaluations and discussions regarding permit reviews or testing, b) special projects, c) drafting permits, and permit appeal processes. For planning purposes, technical support shall be required for approximately eight (8) to sixteen (16) hours per month. Contractor will provide a summary of activities provided under this task as a part of the monthly progress report. At a minimum the summary will include: 1) hours utilized, 2) date of consultation, 3) key points discussed, and 4) any follow-up actions identified per the consultation.

#### **Task 6: Technical Review Training (PWS Area: 4.3.6; 7.2.4)**

Upon the receipt of written technical direction by the EPA WACOR, the contractor shall make one (1) staff person available to provide training on conducting UIC permit application technical reviews. For planning purposes, technical support shall be required for approximately six (6) to ten (10) hours per month. Contractor will develop a tailored webinar using an existing draft UIC permit application submitted to Region 9 and present approaches and methodologies to conduct a technical review of the application, including but not limited to (a) area of review (AOR) determinations and zone of endangering influence calculations; (b) corrective action plan for all wells within the AOR; (c) local and regional geology information; (d) well operating data, well log data, and well testing results; (e) well construction procedures and details; (f) plugging and abandonment plans and its financial assurance; and (g) proposed operational, testing, monitoring, and reporting programs. The contractor shall summarize the training performed under this task as a part of the monthly progress report. At a minimum, the summary will include: 1) hours utilized, 2) date of training, 3) key points presented, and 4) any follow-up actions identified per the training.

#### **IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
0	Work Plan, Monthly Progress and Financial Reports	Per Contract Requirements
1	UIC Permit Application Support	
1.1	Permit Application Administrative Completeness Report	Initial draft within 3 weeks of receipt of technical direction.
1.2	Technical Review Analysis	Initial draft within 6 weeks of receipt of technical direction.
2	Permit Process Report	
2.1	Statement of Basis	Initial draft within 2 weeks of receipt of technical direction.
2.2	Public Notification Document Development	Concurrent with submittal of statement of basis.
2.3	Public Meetings/Hearings Support/Permit Appeal	2 - 4 weeks prior to public hearing or 1 -2 weeks from receipt of technical direction.
2.4	Response to Comments Document Development	Within 4 weeks of delivery of public comments.
3	Permit Implementation Support	Within 1-4 weeks of receipt of technical direction., depending on complexity.
4	Special Studies/Technical Reviews	Within 1-6 weeks of receipt of technical direction., depending on complexity
5	Consultation Support	Summary of consultation should be noted in the monthly progress report as noted in Task 5 above.
6	Technical Review Training	Summary of training performed



		should be noted in the monthly progress report as noted in Task 6 above.
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## **V. MISCELLANEOUS**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. TRAVEL**

The contractor shall anticipate two (2) SME non-local trips in support of this WA over the duration of the performance period. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Task 2, as well as the EPA's Mission to ensure protection of human health and the environment. The contractor shall receive advanced approval from the CL-COR for all non-local travel and this process shall be separate from the work plan approval process. Travel and associated costs shall be allowable in accordance with the contract level clauses. Requests for contractor travel authorizations shall contain the following at a minimum: (1) Individual(s) traveling. Identify position and affiliation as a contractor/subcontractor employee or authorized consultant. (2) Description of circumstances necessitating the travel. Identify the task that will benefit from the travel and detail the correlation of the travel to the requirements of the Work Assignment. (3) Identify the estimated cost and include a cost breakdown.

## **VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

## **VIII. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## **IX. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## **X. Technical Direction**

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

## **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-92				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Reg 9 Support for Guam EPA				
Contractor Cadmus Group LLC, The						Specify Section and paragraph of Contract SOW 2.2, 8.1.2				
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2019   To   06/30/2020				
Comments:										
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund         <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund       </div>										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:                      Cost/Fee:                      LOE: 09/01/2015   To   06/30/2020										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:                      Cost/Fee                      LOE:										
Cumulative Approved:                      Cost/Fee                      LOE:										
Work Assignment Manager Name   Carl Goldstein  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 415-972-3767 FAX Number:			
Project Officer Name   Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:			
Other Agency Official Name   Lisa Mitchell-Flinn  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:			
Contracting Official Name   Camille W. Davis  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2095 FAX Number: 513-487-2115			

## **PERFORMANCE WORK STATEMENT**

**Cadmus EP-C-15-022**

**Work Assignment No. 4-92**

**July 1, 2019 – June 30, 2020**

### **I. ADMINISTRATIVE:**

**PWS: 2.2, 8.1.2**

**A. Title:** Support for Guam Environmental Protection Agency: Primacy Technical Support to Prepare Primacy Applications and Specialized Technical Support to Develop Rule Management SOPs

**B. Work Assignment Manager (WACOR):     Alternate WACOR:**

Carl Goldstein  
U.S. EPA Region 9  
75 Hawthorne Street (LND-3-2)  
San Francisco CA 94105  
(415) 972-3767  
goldstein.carl@epa.gov

None

### **C. Quality Assurance:**

The tasks in this work assignment do not require environmental measurements. Consistent with the Agency's quality assurance (QA) requirements, the Contractor does not need to supplement the Contract Level Quality Assurance Project Plan (QAPP) or prepare a Project-Specific Quality Assurance Project Plan (PQAPP).

### **D. Background:**

Under the Safe Drinking Water Act (SDWA), the Environmental Protection Agency (EPA) is authorized to delegate primary enforcement responsibility of the National Primary Drinking Water Regulations (NPDWRs) to states. In order to maintain primacy, states must adopt all new and revised NPDWRs promulgated under §141 and submit revised primacy applications within two years of rule promulgation (up to four years if EPA approves a two year extension). §142.12 specifies the requirements for the revision of state programs. Guam Environmental Protection Agency (GEPA), which has been delegated primacy for a drinking water program, has fallen behind in submitting primacy packages for a number of rules, and it does not have the resources to complete this work.

GEPA's drinking water program, by which it regulates public water systems (PWSs) on Guam, has experienced high turnover among its staff in the past several years. In order to promote consistency and continuity during changes to federal rules and its staff, GEPA needs a set of standard operating procedures (SOPs) developed for each cluster of SDWA regulations. These SOPs must be comprehensive, understandable, accurate, updatable, useful documents that would

allow a novice to the SDWA program to learn the applicable regulations and how to implement them in a manner consistent with GEPA policies.

## **II. OBJECTIVE:**

The Contractor shall provide support to GEPA in the development of primacy revision applications for all NPDWRs promulgated and currently in effect under §141, except the Total Coliform Rule and the Surface Water Treatment Rule (see Tasks 0 and 1 in Section III below).

The Contractor shall also create GEPA-specific SOPs for the eleven (11) SDWA regulation clusters in effect as of May 17, 2016, in coordination with the current GEPA Safe Drinking Water Program (SDWP) manager and/or designee (the SDWP manager and/or designee hereinafter referred to as “rule manager”) and the EPA WACOR (see Tasks 0, 2, 3, and 4 in Section III below). The eleven specific rule clusters include the following, and are referred to as “Rule(s)” in the remainder of this PWS:

1. Nitrates Rule
2. Radionuclides Rule
3. Total Coliform Rule (includes basic inventory of PWSs)
4. Stage 1 and Stage 2 D/DBP Rule
5. Groundwater Rule – including significant deficiencies
6. Lead and Copper Rule
7. Consumer Confidence Reporting Rule
8. Public Notice Regulations
9. SOC/VOC/IOC Phase II/V Rules (separate sections for arsenic and asbestos)
10. Inventory
11. Surface Water Treatment Rules (SWTR - including determination of GWUDI, LT1SWTR, IESWTR, FBRR and LT2SWTR – including significant deficiencies)

The sequence of SOP development for the rules will be determined by the EPA WACOR, and provided to the Contractor through written technical direction.

The Contractor must utilize knowledge of the SDWA regulations and available implementation and compliance guidance, as well as a working knowledge of the capabilities of SDWIS/STATE Web Release 3.3 for support of rule implementation. Two hard-copies (in binders), as well as an electronic copy, of each SOP shall be provided as deliverables. For the electronic copy, all narratives, instructions, and other documents created by the Contractor must be in Microsoft Office Word 2007 or later format to allow updating. (References and other materials not created by Contractor may be in pdf or other format).

**The portions of the SOPs detailing use of SDWIS 3.1 shall be prepared by separate process and are not part of this Performance Work Statement.**

## **III. TASK DETAIL:**

The Contractor shall perform the following tasks:

## **Task 0 – Work Plan and Monthly Progress Reports**

The Contractor shall prepare a detailed work plan and budget for the accomplishment of the tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff and their qualifications; (b) the number of hours and labor classifications proposed for each task, broken down to task level, to include both prime contractor and subcontractor labor (if applicable); and (c) a list of deliverables, with due dates and schedule for deliverables. The work plan shall also include the Contractor's key assumptions on which the staffing plan and budget are based. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs.

This task also includes monthly progress and financial reports which are to be submitted pursuant to Attachment 2 of the contract. Monthly financial reports must include a table with the invoice level of effort (LOE) and costs broken out by the tasks in this work assignment (WA).

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

In addition, the work plan shall specify that a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract Level Quality Assurance Project Plan (QAPP) or a Project-Specific Quality Assurance project Plan (PQAPP) is not required. This task also includes monthly progress and financial reports. Monthly financial reports must include a table with the invoice LOE and cost amount broken out by the tasks in this WA.

Deliverables: Work plan and monthly progress and financial reports.

## **Task 1 – Support for GEPA in the Development of Primacy Revision Applications for NPDWRs**

At the written direction of the WACOR, the Contractor shall provide support to GEPA in developing primacy revision applications for drinking water rules. For some rules, GEPA may have a draft rule revision and partially compiled draft primacy package. In those cases, the Contractor shall review these drafts, discuss with GEPA, and determine how best to proceed in completing proposed rules and preparing a complete primacy package for submittal to EPA.

For each NPDWR, EPA prepares implementation guidance that provides an explanation of the rule's requirements and guidance for preparing State primacy revision applications. The Contractor shall follow the appropriate implementation guidance in its support of GEPA in developing primacy revision applications. Implementation guidance for each of the new and revised rules may be accessed from EPA's website at <http://www.epa.gov/dwreginfo/state-resources-implementing-drinking-water-rules>.

The Contractor will not be allowed to provide technical support to EPA in determining compliance with regulatory requirements for any of the primacy revision applications for which the Contractor provided support to GEPA under this work assignment.

## **Task 2 - Development and Delivery of Draft SOP(s)**

The EPA WACOR will specify the next drinking water rule(s) for SOP development, and provide the Contractor the name/contact information of the rule manager to work with for that drinking water rule. The SOPs will be developed as follows:

### **Subtask 2.1: Development of first draft SOP(s)**

The Contractor shall contact the rule manager for the specific rule for the GEPA-specific material indicated \*\* in **Attachment 1: Basic Format for Standard Operating Procedures (SOPs)**. Using materials which have been previously prepared for EPA, information supplied by GEPA, as well as those available on the EPA OGWDW website such as the Water Supply Guidance, the Contractor shall assemble a preliminary/draft SOP for the rule. The Contractor shall ensure that at least one (1) senior-level technical expert for the specific rule reviews the draft SOP for accuracy prior to providing the draft to EPA. **The draft SOP may have modifications to the Attachment 1 format as requested by EPA.**

The Contractor shall email a Microsoft Word copy of the draft SOP to the rule manager and the EPA WACOR within thirty (30) business days of the date the Contractor was provided the next list of drinking water rules for which to develop SOPs.

### **Subtask 2.2: Interview rule manager for additional specific information on rule implementation.**

Within fifteen (15) business days after the first draft SOP has been provided to the rule manager and EPA WAM, the Contractor shall: (1) contact the rule manager and EPA WACOR by telephone and/or email to set up a future phone interview(s) not to exceed total interview time of four hours per rule manager; and (2) develop a brief interview questionnaire based on the model questionnaire (**Attachment 2: Rule Manager Interview Questionnaire**) which will be used to discuss/document any unique GEPA interpretations that the rule manager indicates are not reflected in the draft guidance, document answers to any necessary clarifying questions, document if portions of the rule are not being implemented, and note any areas for rule implementation improvement based upon the Contractor's expertise. **The questionnaire may have modifications to the Attachment 2 format as requested by EPA.**

### **Subtask 2.3. Document interview/call with rule manager and EPA WAM**

The interview results shall be documented by the Contractor on the questionnaire and provided to the EPA WACOR within five (5) business days of the final interview call.

### **Task 3 – Finalization of the SOP pending GEPA and Region 9 review**

#### **Subtask 3.1: Revision of the first draft SOP after the call/interview to create second draft**

Following the interview call, the Contractor shall update/correct the draft SOP to create a second draft. The Contractor shall provide that at least one (1) senior-level technical expert for the specific rule reviews the updated SOP for accuracy prior to providing the final draft to EPA. Within fifteen (15) business days following the final interview call, the Contractor shall provide an updated Word version of the second draft SOP via email to the EPA WACOR and rule manager for additional review.

As time and funding allows, the Contractor may also be requested to develop the final draft documents for the remaining SOPs under Subtask 2.2 and 2.3.

#### **Subtask 3.2. Revision of second draft SOP to create final draft**

Comments will be provided back to the Contractor on the second draft SOP. Within ten (10) business days of receipt of EPA comments on the second draft, the Contractor shall update/correct the second draft SOP to create a final draft. The Contractor shall provide that at least one (1) senior-level technical expert for the specific rule reviews the updated SOP for accuracy prior to providing the final draft to EPA. Within ten (10) business days following receipt of comments on the second draft SOP, the Contractor shall provide an updated Word version of the final draft SOP via email to the EPA WACOR and rule manager for additional review.

#### **Subtask 3.3: Finalization of SOP**

Comments will be provided back to the Contractor for incorporation, clarification, and final editing. Within ten (10) business days of receipt of final comments from the EPA WACOR, the Contractor shall provide the final rule SOP in electronic version Word 2007, along with two hard copies in ring binders. For the electronic copy of each SOP, all narratives, instructions, and other documents created by the Contractor must be in Word 2007 to allow updating. (References and other materials not created by the Contractor may be in pdf or other format).

### **Task 4 – Creation of Up to Three (3) additional final SOPs**

Upon notification by the EPA WACOR of the name/contact information of the rule manager for the next rule SOP(s), the Contractor shall repeat Tasks 2 and 3 for up to three (3) additional rules. Each SOP shall follow the format of Attachment 1: Basic Format for Standard Operating Procedures (SOPs). The materials previously developed for the first SOP (e.g. Attachment 2: Interview Questionnaire, general introduction to SDWA) shall be re-used whenever possible for the additional SOPs; they shall not be re-created. The EPA WACOR shall specify the approximate priorities of the rules for SOP development. The EPA WACOR shall be provided copies of all draft SOPs and be included in all formal interviews.

As time and funding allows, the Contractor is also requested to develop the first draft documents for the remaining SOPs.

#### **IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b><u>Task 0 – Workplan</u></b>		<b><u>According to Contract</u></b>
<b><u>Task 1 – Support for GEPA in the Development of Primacy Revision Applications for NPDWRs</u></b>		
	Delivery of first draft Primacy Revision Application (emailed to EPA WAM and rule manager)	Within sixty (60) business days of receipt of written direction from EPA WAM.
<b><u>Task 2 – Development and Delivery of draft SOP(s)</u></b>		
Subtask 2.1	Delivery of first draft SOP (emailed to EPA WAM and rule manager)	Within thirty (30) business days of receipt of the name/contact information of the rule manager for first rule SOP.
Subtask 2.2	Interview rule manager for additional specific information on rule implementation.	15 business days after providing draft SOP under Subtask 1.1
Subtask 2.3	Document interview/call with rule manager and EPA WAM	5 business days after the final interview call
<b><u>Task 3 – Finalization of the SOP pending Region 9 review</u></b>		
Subtask 3.1	Revision of the first draft SOP after the call/interview to create second draft	15 business days following the final interview call
Subtask 3.2	Revision of second draft SOP to create final draft	10 business days after receipt of comments on 2 <sup>nd</sup> draft from EPA WAM
Subtask 3.3	Finalization of SOP	10 business days of receipt of final comments from the EPA WAM

**Task 4 – Creation of Up to Three (3) additional final SOPs –** Within 60 days upon written technical direction to proceed with an SOP.

## **V. MISCELLANEOUS**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2007 or higher)
Preferred presentation format:	Power Point, Office 2007 or higher
Preferred graphics format:	Each graphic is an individual JPG file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. Quality Assurance Surveillance Plan**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WAM based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.

## **VII. Travel**

The contractor shall anticipate 1 (one) trip for two individuals in support of Task 1 of this WA over the duration of the performance period. Travel is to the Territory of Guam for approximately one week to conduct onsite technical assistance in developing and finalizing the SOPs and primacy package.



## **ATTACHMENT 1: BASIC FORMAT FOR STANDARD OPERATING PROCEDURES (SOPs)**

As a separate volume, a general narrative (plain English) introduction to the SDWA shall be written, including definitions of a PWS, type of PWSs, relationship between the SDWA, the Code of Federal Regulations, and 40 CFR Parts 141 versus 142. Other general information such as tables of the primary and secondary MCLs shall be included. The intent of the introduction to the SDWA is to serve as an accompaniment to all of the SOPs in total.

Each draft SOP must have sections addressing, at a minimum, each of the following areas:

- a. A preface summary sheet (6 pages maximum) that provides a basic guide to GEPA staff on key elements of the rule and aspects of the rule that they are likely to implement on a frequent or routine basis. The intent of the summary sheet is not to be all-inclusive of the rule requirements but, rather, to serve as a quick reference guide for a GEPA staff person on day-to-day implementation of the rule. The guide should be tailored to be as specific as possible to Guam PWSs. Any allowance for exceeding the 6-page maximum must be approved by the EPA WAM, on a case-by-case basis.
- b. General narrative (plain English) introduction to the SOP-specific rule(s), including identification of all sections in the 40 CFR which are applicable. This introduction must recommend reading materials for the new rule manager, including proposed and final Federal Registers (copies included), implementation guidance (reference where available), question and answer documents, etc. The Contractor shall also modify the electronic Code of Federal Regulations (excerpt those portions related to the rule(s) into a Word document) to provide repeated section/subsection references to allow easier reading. An example will be provided by the EPA WACOR. The general narrative must also briefly explain how the specific rule(s) interact with all other rule(s) – such as how changes to SWTR treatment (from conventional to alternative filtration) may affect enhanced coagulation requirements under the Stage 1 DBPR, and how the treatment change may affect monitoring requirements under the Lead and Copper Rules. A full list of references for that rule(s) must be provided.
- c. Implementation Basics. This may be split into the following sections at a minimum. Separate sections may be needed for very complicated rule clusters such as IESWTR/LT1SWTR versus LT2SWTR. Non-written GEPA policies in each of these areas should be discussed as provided by the rule manager.\*\*
  - 1) – how to determine regulated universe of PWSs for the specific rule.
  - 2) – how to address new systems and/or new sources for this rule
  - 3) – expectations (submittals from) the regulated universe: monitoring data, sampling data, use of certified labs, monthly reports and where these requirements are referenced in the 40 CFR. Copies of GEPA-specific monitoring and reporting forms (and where they can be found at GEPA)\*\*
  - 4) – monitoring/sampling plan requirements, increased/decreased monitoring, various approval letters for these\*\*
  - 5) – use of Reporting Tool or other GEPA-generated reports used for implementation
  - 6) – what constitutes each type of violation
  - 7) – how to use Compliance Decision Support and migrate candidate violations

- 8) – timeframes and processes for reminding systems of potential FTM/FTR violations, determining each type of violation, SDWIS data and violation entry timeframes\*\*
  - 9) – needed action by the rule manager and the PWS for each type of violation or noncompliance situation, including templates of violation letters\*\*
  - 10) – how to determine “Return to Compliance” (include latest OGWDW spreadsheet)
  - 11) PLACEHOLDER FOR: how to use SDWIS 3.1 for implementation
  - 12) - Public Notice Requirements and templates \*\* specific to the rule(s)
  - 13) - CCR Requirements and templates \*\* specific to the rule(s)
- d. Compilation of OGWDW and written GEPA-specific policies for implementing this rule(s). Specify where found on internet and at GEPA. (GEPA documents shall be provided to the Contractor)\*\*
  - e. Compilation of GEPA presentations on the rule(s) – handout copies of PowerPoint presentations as well as indication of location at GEPA (folder, file name)\*\*
  - f. Copies of all GEPA tracking spreadsheets, including locations at GEPA\*\*
  - g. Brief discussion of GEPA final document disposition (filing) for all data, reports, etc\*\*

## ATTACHMENT 2: RULE MANAGER INTERVIEW QUESTIONNAIRE

### GEPA STANDARD OPERATING PROCEDURES \_\_\_\_\_ RULE

Cadmus Interviewer: \_\_\_\_\_

Attendees: GEPA: \_\_\_\_\_

Cadmus: \_\_\_\_\_

Rules Covered: \_\_\_\_\_

Date: \_\_\_\_\_

All questions were answered from the point of view of the topic covered.

#### Protocols for the PWSs

1. Does GEPA have any specific protocols or written guidance materials for water systems in the following scenarios? If Yes, please explain.

	Y/N	Protocols	Y/N	Guidance
a. Whole New Systems (built or found)		•		
b. Existing Systems Acquiring a New Source		•		
c. Approving Parties to Conduct Testing		•		
d. PWS Data Submittal		•		
e. Notifying PWS of a Violation		•		
h. Sampling Procedure Guidance		•		•

#### Protocols for the Region

2. Does GEPA have any specific protocols or written guidance materials for Regional staff or contract staff in the following scenarios? If Yes, please explain.

	<b>Y/N</b>	<b>Protocols</b>	<b>Y/N</b>	<b>Guidance</b>
a.		Sanitary Survey or PWS Site Visits	•	
b.		Reporting Special Information to EPA Headquarters	•	
c.		Public Notification	•	
d.		Monitoring Schedules	•	
e.		Initial Monitoring	•	
f.		Routine Monitoring	•	
g.		Increased/Additional Monitoring	•	
h.		Reduced Monitoring/Waivers		
i.		Data Processing	•	
j.		Enforcement	•	
k.		Emergency	•	

### Templates for the PWSs

3. Does GEPA have any additional guidance documents and/or templates to help PWSs? If Yes, please explain. For the templates please include how they are formatted and used.

	<b>Y/N</b>	<b>Guidance</b>	<b>Y/N</b>	<b>Templates</b>
a.		Public Notification		
b.		CCR		

### Filing System

4. Can you please describe your electronic and hard copy filing system?

#### Including:

- a. A description of your electronic and hard copy filing system?

- b. How information is submitted and processed?
- c. How is GEPA organizing, reviewing and storing submissions from PWSs?
- d. How are laboratories and PWSs reporting to GEPA?
- e. Is GEPA using a database to track the completeness of PWS and laboratory submissions? Is there guidance on the use? Where is it located?

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-95				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number      4			Title of Work Assignment/SF Site Name Reg 10 FWSS DI Support				
Contractor Cadmus Group LLC, The				Specify Section and paragraph of Contract SOW 3.0						
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   08/23/2019   To   06/30/2020				
Comments:										
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund         <span>Accounting and Appropriations Data</span> <input checked="" type="checkbox"/> Non-Superfund       </div>										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
09/01/2015 To 06/30/2020										
This Action:						17				
Total:						17				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name   Johnny Clark  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 206-553-0082 FAX Number: 206-553-1280				
Project Officer Name   Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name   Camille W. Davis  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2095 FAX Number: 513-487-2115				

## **PERFORMANCE WORK STATEMENT**

**EP-C-15-022**

**Work Assignment No. 4-95**

**(July 1, 2019 - June 30, 2020)**

### **I. ADMINISTRATIVE:**

**A. Title: EPA Region 10 PWSS Direct Implementation Support**

**B. Work Assignment Contracting Officer's Representative (WACOR)**

Johnny Clark  
Water Division  
Groundwater and Drinking Water Section  
1200 6th Avenue, Suite 155  
Mail Stop 19-H16  
Seattle, WA 98101-3123  
Phone: 206-553-0082  
Fax: 206-553-1280  
Email: [clark.johnny@epa.gov](mailto:clark.johnny@epa.gov)

**Alternate WACOR**

None

**C. Quality Assurance:**

The tasks in this work assignment do not require environmental measurements. Consistent with the Agency's quality assurance (QA) requirements, the contractor does not need to supplement the Contract Level Quality Assurance Project Plan (QAPP) or to prepare a Project-Specific Quality Assurance Project Plan (PQAPP).

**D. Background:**

EPA Region 10 is responsible for the direct implementation of the Public Water System Supervision (PWSS) Program on tribal lands in Region 10. As the primacy agency for the PWSS program, Region 10 receives and reviews compliance data from approximately 140 regulated PWSs.

**PWS: 3.0**

**LOE: 17 Hours**

### **II. OBJECTIVE:**

The Contractor shall provide assistance to EPA for program evaluation and implementation through the development of resources.

File Reviews are intended to verify the reliability of SDWIS data in a manner that is consistent nationwide and to identify opportunities for primacy agency implementation improvements. The purpose of a File Review is two-fold: (1) to detect discrepancies between the PWS data in the primacy agency files or database and the data reported to SDWIS/Fed and (2) to ensure that the

primacy agency is determining compliance in accordance with federal regulations. Enforcement actions are not typically reviewed.

### **III. TASK DETAIL:**

The Contractor shall perform the following tasks:

#### **Task 0 – Work Plan Submission**

The Contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs.

This task also includes monthly progress and financial reports. Monthly financial reports shall be submitted per contract reporting requirements and must include a table with the invoice LOE and cost broken out by the tasks in this WA. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved.

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

The Contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the Contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Deliverables: Work plan and monthly progress and financial reports.

#### **Task 1 – Region 10 PWSS Direct Implementation Program Review**

The Contractor shall perform a File Review/Program Review of the Region 10 Direct Implementation (DI) program in the EPA Region 10 office, no later than December 31, 2018. The Contractor shall follow the most up-to-date PWSS Program Data File Review protocol, format, and electronic data capture form developed by EPA. This review protocol should serve as a template for the review of a selection of compliance data from Region 10 tribal public water systems for compliance determinations. Region 10 will provide the necessary data in hard copy and electronic format, if available.

The review protocol shall include:



- Program implementation questionnaire to be asked via phone call and written questionnaire of the EPA Region 10 DI program staff to ensure that the team understands the DI program's regulatory implementation policies and data management practices;
- A list of questions to be asked during the on-site review;
- Review of EPA Region 10 PWS files, including use of the Safe Drinking Water Information System State Version (SDWIS-State) and/or hard copy files; and
- Data capture forms to be used for the review.

Region 10 will set up a conference call prior to the on-site review to provide background and identify preliminary data which should be provided to the Contractor prior to the on-site review. Additional calls may be necessary to set up data collection processes.

The Contractor shall coordinate with EPA Region 10 to connect remotely to the data system to pull the sample for review. The protocol shall be used to determine a statistically significant sample size. The Contractor shall work remotely by connecting to the EPA Region 10 database to complete as much of the review as possible before travelling on-site to answer questions and complete interviews.

The draft and final reports of findings shall follow the Program Data File Review Protocol using the report template in the electronic data capture form, and the reports should include any additional program review information necessary to provide a summary of the file review, summary of interviews, and strengths/weaknesses of the program. The review shall indicate where improvements in data flow, coordination between organizational units, compliance determinations, and tracking may be made. EPA Region 10 will use the findings of the review to improve procedures for reviewing incoming data and documenting compliance decisions related to the Region 10 tribal public water systems.

For budgeting purposes, the Contractor should anticipate providing two (2) staff (at least one experienced in performing data verifications/program reviews) for an on-site visit in Seattle lasting no more than three (3) days. The report is anticipated to be approximately 40 pages, excluding organizational charts and other supplemental information deemed relevant, which should be included in appendices. The draft report will be provided to the WACOR for comments and corrections within 30 days of the site visit. The report will be reviewed simultaneously by the WACOR and one to two other EPA commenters who will provide comments. The Contractor shall incorporate reviewer comments and deliver the final report in electronic format within 30 days of receiving comments. Email submission is acceptable, as is posting of large documents to a secure FTP website.

Deliverables: on-site review, draft report, and final report.

#### IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
0	Work Plan and budget	According to contract
	Monthly progress and financial reports	Monthly according to contract
1	<del>Region 10 PWSS Direct Implementation On-site Review</del>	<b>COMPLETED</b>
1	<del>Draft Region 10 PWSS Direct Implementation Program Review and Report</del>	<b>COMPLETED</b>
1	Final Region 10 PWSS Direct Implementation Program Review and Report	August 13, 2019

#### V. MISCELLANEOUS

##### Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See:

<http://www.section508.gov/>

Preferred text format: MS Word, 8.0 or higher (Office 2003 or higher)

Preferred presentation format: Power Point, Office 2003 or higher

Preferred graphics format: Each graphic is an individual GIF file

Preferred portable format: Adobe Acrobat, version 6.0

##### TRAVEL

Travel is anticipated for this work assignment following appropriate approval by the work assignment CLCOR. Any travel will be allowable only in accordance with the limitation of FAR 31.205-43 and FAR 31.205-46, and must be approved by the appropriate EPA CLCOR prior to travel taking place.

This work assignment anticipates one trip to Seattle, WA. Travel will occur within the timeframes noted on the Deliverables table.

##### CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The Contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the Contracting Officer (CO), CLCOR and/or WACOR.

##### PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

**VI. Quality Assurance Surveillance Plan**

All task(s) identified in the performance work statement above are subject to review and approval by the WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, schedule, and document development standards.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-96	
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:	
Contract Number EP-C-15-022		Contract Period 09/01/2015 To 06/30/2020		Title of Work Assignment/SF Site Name			
		Base                      Option Period Number                      4		Reg 8 UIC Dewey-Burdock Permit			
Contractor Cadmus Group LLC, The				Specify Section and paragraph of Contract SOW 2.2, 2.3, 4.3			
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval				Period of Performance  From 07/01/2019 To 06/30/2020			
Comments:							
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund							
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations data use EPA Form 1900-69A.							
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)    (Cents)    Site/Project (Max 8)    Cost Org/Code
1							
2							
3							
4							
5							
Authorized Work Assignment Ceiling							
Contract Period:		Cost/Fee:		LOE: 0			
09/01/2015 To 06/30/2020							
This Action:				640			
Total:				640			
Work Plan / Cost Estimate Approvals							
Contractor WP Dated:				Cost/Fee		LOE:	
Cumulative Approved:				Cost/Fee		LOE:	
Work Assignment Manager Name    Bruce Suchomel						Branch/Mail Code:	
_____ (Signature)                      (Date)						Phone Number: 303-312-6001	
						FAX Number:	
Project Officer Name    Nancy Parrotta						Branch/Mail Code:	
_____ (Signature)                      (Date)						Phone Number: 202-564-5260	
						FAX Number:	
Other Agency Official Name						Branch/Mail Code:	
_____ (Signature)                      (Date)						Phone Number:	
						FAX Number:	
Contracting Official Name    Camille W. Davis						Branch/Mail Code:	
_____ (Signature)                      (Date)						Phone Number: 513-487-2095	
						FAX Number: 513-487-2115	

## **PERFORMANCE WORK STATEMENT**

**Contract: EP-C-15-022**

**Work Assignment No. 4-96**

**Period of Performance: 7/1/2019 - 6/30/2020**

### **I. ADMINISTRATIVE**

**A. Title: Support for Region 8 Underground Injection Control Dewey-Burdock Permitting Actions**

**B. Work Assignment Contracting Officer's Representative:      Technical Contact:**

Bruce Suchomel  
Underground Injection Control (UIC) Unit  
USEPA Region 8  
1595 Wynkoop Street  
Mail Code: 8WP-SUI  
Denver, CO 80202-1129  
Email: [suchomel.bruce@epa.gov](mailto:suchomel.bruce@epa.gov)  
Phone: 303.312.6001  
Fax: 303.312.7517

### **C. Quality Assurance:**

This Work Assignment (WA) is a continuation of WA 3-96, which required the Contractor to develop a quality assurance project plan specific to WA 3-96 to supplement the Contract-Level Programmatic Quality Assurance Project Plan (PQAPP), dated September 3, 2015. The Contractor developed the Supplemental Quality Assurance Project Plan (SQAPP) consistent with the EPA's QA requirements. The SQAPP was approved by the Region 8 Quality Assurance Director on December 18, 2018.

Task 2 in this work assignment involves developing a response to comments received from the public notice of proposed EPA regulatory actions. This task requires quality assurance (QA) planning and documentation to ensure each comment received is included in the response-to-comments document and no comment is neglected. The QA elements for Task 2 are addressed in the SQAPP developed under WA 3-96. The project-specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0 below.

### **D. Background:**

The Underground Injection Control (UIC) Program is authorized under the Safe Drinking Water Act. The primary mission of the UIC Program is the regulation of injection wells for the protection of underground sources of drinking water (USDWs). The definition of USDW is found in UIC regulations at 40 Code of Federal Regulations (CFR) §144.3.

The Region 8 UIC Program has proposed three distinct but related actions at the Dewey-Burdock Site: a Class III draft permit authorizing injection of fluid into uranium ore zones for uranium recovery; an aquifer exemption for the uranium-bearing zones and a Class V deep well permit to dispose of treated in-situ recovery (ISR) waste fluids generated at the Dewey-Burdock site. These actions are regulated under the UIC regulations found at 40 CFR parts 124, 144 and 146. UIC regulations specific to injection wells in South Dakota are found at 40 CFR 147 Subpart QQ. In addition to the UIC permits, the site is

also regulated by the Nuclear Regulatory Commission (NRC). The NRC has issued a Radioactive Materials Handling License for the site.

This WA is a continuation of previous WA 3-96, which included three tasks providing contractor support to the EPA Region 8 UIC Program (hereafter EPA) to proceed efficiently with permitting activities at the Dewey-Burdock Uranium Site. The Contractor completed Task 1 under WA 3-96; Tasks 2 and 3 had not been completed by the end of Option Period 3 and are, therefore, included in this WA. The WA 3-96 task numbers are being carried over to this WA to reflect the continuity of the work and to avoid confusion moving forward.

The Dewey-Burdock project site is located near the Black Hills in South Dakota. The Black Hills are of historic interest to many tribes. The UIC permitting actions have resulted in a lengthy, complicated tribal consultation process that began in 2013, but has not reached successful completion. The lengthy, complicated tribal consultation process has added considerable time to the UIC Dewey-Burdock permitting process. The Region 8 UIC Program is seeking contractual assistance to conduct a respectful tribal consultation process.

The Region 8 Tribal Assistance Program maintains a contact list of tribal leaders for Region 8 tribes but does not include Tribal Historic Preservation Officers (THPOs). The Department of Housing and Urban Development (HUD) recently updated its Tribal Directory Assistance Tool (TDAT) with new information gathered from Indian tribes. TDAT is a free, web-accessible contact database that contains information about federally recognized Indian tribes and their geographic areas of current and ancestral interest at the county level. It lists names and contact information for tribal leaders and THPOs as well as links to tribal websites. Users can query the database by street address, county, state, and tribe. Information generated from TDAT can be exported in spreadsheet format for use in other programs. TDAT was designed to help users quickly identify tribes and provide appropriate tribal contact information to assist with initiating Section 106 consultation. For more information about TDAT, see the ACHP's information paper at <http://www.achp.gov/tdat.html>. TDAT can be accessed at <https://egis.hud.gov/tdat/>.

As part of the administrative record for the draft UIC permits, the Region 8 UIC Program developed fact sheets for both UIC draft permits, a draft record of decision for the aquifer exemption, a draft cumulative effects analysis document, a draft environmental justice analysis document and a draft document proposing the Region 8 UIC Program's plan for complying with Section 106 of the National Historic Preservation Act. These documents were also available for public review and comment.

The UIC permitting process requires the Region 8 UIC Program to conduct a public comment period per requirements under 40 CFR § 124.10 and issue a response-to-comments document under 40 CFR § 124.17. During the public comment period for the Dewey-Burdock site, the EPA received a large volume of comments on the proposed UIC actions and draft documents. In a previous Work Assignment (2-94) under this contract, Cadmus categorized the comments into 43 different topics.

Responses to many of the comments are found in the draft documents that were part of the administrative record. The EPA is seeking contractual support to develop a response-to-comments document based on the comment topics in the categorized comment document deliverable generated under the previous Work Assignment and the information in the draft documents that were part of the administrative record.

## II. OBJECTIVE

The objective of this Work Assignment is to obtain contractual support for the Region 8 UIC Program (hereafter EPA) to proceed efficiently with permitting activities at the Dewey-Burdock Uranium Site by:

1. Providing assistance in adding contact information to EPA-generated tribal consultation letters that will be mailed to approximately 23 tribes on up to two separate occasions;
2. Providing assistance in contacting tribal offices to identify tribes who are interested in scheduling consultation meetings with the EPA, identify the designated tribal contacts for the Dewey-Burdock consultation process and schedule consultation meetings with interested tribes; and
3. Developing a general framework for the response-to-comment document based on:
  - a. The comment topics in the categorized comment document deliverable generated under a previous Work Assignment and
  - b. The information available in the draft documents that were a part of the Dewey-Burdock administrative record.

## III. TASK DETAIL

The contract level sections that support this work assignment include: 2.2, 2.3, and 4.3.

The total LOE for this Work Assignment is: 640 hours.

The Contractor shall perform the two tasks described below as well as the administrative tasks described under Task 0.

### **Task 0: Work Plan, QA Documents and Monthly Progress Reports**

The LOE for Task 0 is: 75 hours

**Subtask 0.1:** The Contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the Contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs. The work plan shall also address the specific quality assurance requirements, as applicable.

**Subtask 0.2:** This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in this WA. All reports shall be completed and submitted in accordance with the current contract requirements.

### **Task 0 Deliverables:**

1. Work Plan,
2. Monthly progress and financial reports.

**Task 1: Task Completed under WA 3-96**

As stated previously, this WA is a continuation of previous WA 3-96, which included three tasks. The Contractor completed Task 1 under WA 3-96; Tasks 2 and 3 had not been completed by the end of Option Period 3 and are, therefore, included in this WA. The WA 3-96 task numbers are being carried over to this WA to reflect the continuity of the work and to avoid confusion moving forward.

**Task 2: Administrative support with tribal consultation tasks**

The LOE for Task 2 is: 160 hours.

**Subtask 2.1: Generate the tribal contact list.**

1. The Contractor shall generate an up-to-date tribal contact list for the list of tribes supplied by the EPA per #4 above. The up-to-date list will be based on the contact list from the previous tribal consultation letter the EPA mailed in November 2015. The tribal contacts will most likely have changed since that time, so the Contractor shall verify the names of the current Tribal Historic Preservation Officers or preservation contact and the current tribal leader (chairman or president). The EPA will provide a list of contacts for tribes located in Region 8, however, there are tribes on the mailing list outside of Region 8, for which it will be necessary to verify the current contacts.
2. The contact information shall include the names, mailing addresses, phone numbers and email addresses for the tribal leaders and the names, phone numbers and email addresses for the tribal environmental directors and the THPOs.
3. A copy of the contact list shall also be provided to the EPA in MS Word format. Ideally, the contact list is saved on a SharePoint or ftp site, made available to the EPA, and set up to send automatic emails to the Work Assignment Manager and the Technical Contract when the list is updated.
4. The names and addresses of the tribal leaders shall also be included in a file format appropriate for the Contractor use to perform a mail merge with the template tribal consultation letter.

**Subtask 2.2: Prepare a tribal consultation letter for each tribe on the mailing list from a template letter provided by the EPA.**

1. The Contractor shall generate the individual tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. The Contractor shall send the EPA an MS Word file containing the letters ready for printing and signature.

**Subtask 2.3 Email the pdfs of the signed letters and save emails to pdf files.**

1. After signature, the EPA will scan all the signed letters to pdf files and email them back to the Contractor along with enclosures.
2. The Contractor shall email the letters and enclosures to the tribal leaders and include the environmental directors and THPOs in the "courtesy copy" address line.
3. The contractor shall save the emails as pdf files and make the pdf files available to the EPA to add to the administrative record.

**Subtask 2.4: Forward any emails from tribes to the EPA and save the emails as pdf files.**

1. If any tribe sends an email, the Contractor shall immediately forward the email to the EPA Work Assignment COR and copy the Technical Contract.



2. Each email from a tribe shall be saved as a pdf file and made available to the EPA.

**Subtask 2.5: Ongoing list of all communication with tribes.**

1. The Contractor shall maintain an ongoing list of all communication with tribes, including:
  - a. name of tribe,
  - b. name of person,
  - c. date of communication,
  - d. indicate whether communication is by call, voice message or email and
  - e. a brief note on the content of the communication.
2. The Contractor shall make available to the EPA updated lists of recent communication. The EPA's preference would be a list saved on a SharePoint or ftp site accessible by the EPA. The contractor shall either send, or set up automatically generated, emails to the EPA Work Assignment COR when the list is updated.

**Subtask 2.6: Identify tribes interested in consultation with the EPA and identify designated tribal contacts.**

After 10 business days from emailing the consultation letters to the tribal contacts, the Contractor shall call the tribal offices that have not already replied to the emailed letters. The purpose of the call is to:

1. Determine if the tribe wishes to schedule a consultation meeting with the EPA and
2. If so, identify the designated tribal contact for the Dewey-Burdock consultation process. The EPA has already identified the designated tribal contact for the Cheyenne River Sioux Tribe; however, this contact should be confirmed by the Contractor.

**Subtask 2.7: Refer questions and comments to the EPA as appropriate.**

If the tribal office or a tribal contact has any questions that the Contractor is unable to answer or comments the Contractor finds it inappropriate to provide a response to, the Contractor shall

1. Refer the person to the EPA Technical Contact,
2. Notify the EPA Work Assignment COR and Technical Contact and
3. Include the question or comment in the notification.

**Subtask 2.8: Schedule tribal consultation meetings.**

1. After the Contractor has identified the tribes that are interested in scheduling a tribal consultation meeting and the designated tribal contact, the contractor shall begin the process of scheduling consultation meetings.
2. The EPA Technical Contact will provide updated lists dates and times of availability for the Contractor to offer to the tribes to schedule meetings.
3. The Contractor shall call or email the designated tribal contact and offer the available times for scheduling meetings.
4. If a call is made, the Contractor shall send a follow-up email message containing the same information as was conveyed during the call. The email message shall refer to the call or voicemail message left with the tribe.
5. Once a tribe schedules a consultation meeting, the Contractor shall immediately email the EPA Work Assignment COR and copy the Technical Contact so they may begin travel arrangements.
6. The Contractor shall include all communication under this Subtask in the communication list described in Subtask 2.5 and handle any emails received from tribes as described in Subtask 2.4.

7. The EPA anticipates this task will continue until 6 weeks before the issue date of the final permit decision. The Work Assignment COR will notify the Contractor of this date.

**Subtask 2.9: Prepare a final tribal consultation letter for each tribe on the mailing list from a template final tribal consultation letter provided by the EPA**

When the EPA has determined that the opportunity for tribal consultation is drawing to a close, the EPA Work Assignment COR will email the Contractor the following documents:

1. The template final tribal consultation letter as a MS Word file,
2. A list of tribes that will receive the consultation letter, and
3. An updated Region 8 tribal contact list.

The Contractor shall:

1. Generate the individual final tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. Send the EPA an MS Word file containing the letters ready for printing and signature.

**Subtask 2.10 Email the pdfs of the signed letters and attachments and save emails to pdf files.**

1. After signature, the EPA will scan all the signed letters to pdf files and email them back to the Contractor along with enclosures.
2. The Contractor shall email the letters and enclosures to the tribal leaders and include the environmental directors and THPOs in the courtesy copies address box.
3. The contractor shall save the emails as pdf files and make the pdf files available to the EPA to add to the administrative record.
4. The Contractor shall handle any emails received from tribes as described in Subtask 2.4.

**Subtask 2.11: Follow-up calls to tribes to confirm receipt of the final consultation letter.**

1. After 5 business days from emailing the final consultation letters to the tribal contacts, the Contractor shall contact the tribal offices to:
  - a. Confirm that the tribal leader has received the final consultation letter and
  - b. Offer one last opportunity to schedule a consultation meeting.
2. The Contractor shall handle any emails received from tribes as described in Subtask 2.4 and include all communication under this Subtask in the communication list described in Subtask 2.5.

**Task 2 Deliverables:**

1. The final tribal contact list containing contact information for each tribal leader, the tribal environmental director and THPO for each tribe on the mailing list provided by EPA.
2. An MS Word file of the tribal consultation letters ready for the EPA to print and route for signature.
3. Email pdf files of the signed consultation letters and attachments (received from the EPA) to each tribal leader, including the tribal environmental director and THPO as courtesy copies, and save each email as a pdf file.
4. Forward all emails from tribes to the EPA, save the emails as pdf files and make the pdf files available to the EPA.

5. An ongoing list of communication with tribes including the information indicated in Subtask 2.5; make the list available to the EPA.
6. A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed; make the list available to the EPA.
7. Notification to the EPA of any questions or comments from a tribe the Contractor deems appropriate to refer to the EPA.
8. Immediate notification to the EPA when a tribe schedules a consultation meeting.
9. An MS Word file of the final consultation letters ready for the EPA to print and route for signature.
10. Email pdf files of the signed final consultation letters and attachments (received from the EPA) to each tribal leader, including the tribal environmental director and THPO as courtesy copies, and save each email as a pdf file.
11. Follow-up calls to tribes after emailing the final consultation letter.

**Task 3: Development of the Response-to-Comments Document for the Region 8 Underground Injection Control Permitting Actions at the Dewey-Burdock Uranium In-Situ Recovery Site**

The LOE for Task 3 is: 405 hours.

**Subtask 3.1: Review of documents provided by the EPA and identify responses to comments that are available in these documents.**

Upon the initiation of previous WA 3-96, the EPA sent the Contractor via email the following document on November 27, 2018:

1. The document containing the public comments received categorized under the 43 topics, which was a deliverable from Contract EP-C-15-022 Work Assignment 2-94
2. The UIC Class III draft permit and fact sheet,
3. The UIC Class V draft permit and fact sheet,
4. The proposed aquifer exemption Record of Decision,
5. The draft cumulative effects analysis document,
6. The draft environmental justice analysis document,
7. The draft document proposing the EPA's plan for complying with Section 106 of the National Historic Preservation Act, and

**Subtask 3.2: Develop a framework document for the response to comments.**

The Contractor shall write a brief introduction to each comment topic identified in the categorized comment document. The introduction should summarize the full scope of concepts included in the comments.

During this process, the contractor may determine it is appropriate to combine similar comment topics or further split out comments previously grouped under a single topic.

The Contractor shall add two new categories: 1) *Comments related to NEPA* and 2) *Comments related to the Endangered Species Act*. The contractor shall identify comments related to these two new topics that were included under Comment category #38, *Comments about other government agencies or regulatory programs (NEPA, the Clean Air Act, the Nuclear Regulatory Commission, etc.)* and include them under the two new topics as appropriate.

Comment category #1 contains comments that stated general opposition to the Dewey-Burdock project but did not include specific information applicable to the UIC Program. This lack of specific information prevents the UIC program from generating a response to these comments. This comment category should be included near the end of the document and before the topics included in Table 1 below.

Comment category #42, *Comments about Crow Butte*, will be addressed by EPA Region 7. This category should be placed before comment category #1.

The comment topics included in Table 1 are beyond the scope of the UIC Program regulatory authority and no UIC regulations or permit requirements apply to these topics. These comment topics should be grouped under a section of the document with the heading “Comments on Issues outside the Scope of UIC Program Regulatory Authority” and included at the end of the document.

**Table 1. Comments outside the scope of the UIC program.**

<b>Category No.</b>	<b>Comment Category Title</b>
12	Concerns about hydraulic fracturing.
16	Against uranium mining in general.
17	Against uranium mining because of problems with nuclear power generation and nuclear weapons.
18	Concerns about the price of uranium, future demand for uranium and future viability of nuclear energy.
19	Concerns about effects of past uranium mining.
20	Concerns about Azarga (e.g. integrity of investors, integrity of company itself, solvency, experience in the ISR industry, etc.).
35	Concerns the project will not benefit Edgemont, South Dakota Counties, the State of South Dakota or the USA.
36	Comment topic unrelated to the UIC draft permits & aquifer exemption.
37	Any additional topics not included in the above list.
39	Comments about the cost or technical feasibility of treating/remediation of contaminated groundwater

**Subtask 3.3: Include responses to comments that are addressed in the draft documents the EPA developed for the administrative record.**

Many of the comments the EPA received are already addressed in the documents the EPA prepared for the administrative record. These documents are listed under Subtask 3.1.

The Contractor shall include responses to comments as addressed by the information in these documents.

After these responses are included, there may be additional concepts expressed in the comments that were not fully addressed by the information in the draft documents. There may be comment topics that are not addressed by any information in the draft documents. The Contractor shall flag these areas to identify the concepts or comment topics not fully addressed by the available information. The EPA will complete the response-to-comments document and address any remaining concepts and comments.

#### IV. SCHEDULE OF DELIVERABLES:

**Table 2. List of Deliverables and Due Dates**

No.	DELIVERABLE	DATE DUE TO EPA
<b>Task 0: Work Plan and Monthly Progress Reports</b>		
0.1	Work plan and budget	According to contract
0.2	Monthly progress and financial reports	Monthly
<b>Task 1: Task Completed under WA 3-96</b>		
<b>Task 2: Support with Tribal Consultation Administrative Tasks</b>		
2.1	The final tribal contact list containing contact information for each tribal leader, the tribal environmental director and THPO for each tribe on the mailing list provided by EPA.	Within 3 business days after receiving the tribal mailing list from the EPA
2.2	An MS Word file of the tribal consultation letters ready for the EPA to print and route for signature.	Within 3 business days after finalizing the tribal contact list.
2.3	Email pdf files of the signed consultation letters and attachments (received from the EPA) to each tribal leader, courtesy copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files from the EPA.
2.4	Forward all emails from tribes to the EPA, save the emails as pdf files and make the pdf files available to the EPA.	Forward emails to the EPA within 1 business day of receiving the email from a tribe.
2.5	An ongoing list of communication with tribes including the information indicated in Subtask 2.5; make the list available to the EPA.	Update list within 1 business day of the communication event.
2.6	A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed; make the list available to the EPA.	Update list within 1 business day of receiving information from tribe.
2.7	Notification to the EPA of any questions or comments from a tribe the Contractor deems appropriate to refer to the EPA.	Within 1 business day of the referral.
2.8	Immediate notification to the EPA when a tribe schedules a consultation meeting.	The same day of hearing from the tribe, if possible.
2.9	An MS Word file of the final consultation letters ready for the EPA to print and route for signature.	Within 3 business days after receiving the tribal mailing list from the EPA
2.10	Email pdf files of the signed final consultation letters and attachments (received from the EPA) to each tribal leader, copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files of the scanned signed letters from the EPA.
2.11	Follow-up calls to tribes after emailing the final consultation letter.	Begin calls after 5 business days of emailing the final consultation letter, completing the task within 10 business days of emailing the final consultation letter.

**Table 2. List of Deliverables and Due Dates – continued**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>Task 3: The Response-to-Comments Document</b>		
<b>3.1</b>	An MS Word document containing introductions to comment topics with areas flagged for the EPA where the responses to some comments or comment concepts were not addressed by the information provided in the draft documents.	Within 55 business days after receiving the documents listed under Subtask 3.1 from the EPA.
<b>3.2</b>	Any QA documentation generated while tracking comments under the appropriate response section in the Response-to-Comments document, as applicable.	At the time deliverable 3.1 is submitted.

## **V. MISCELLANEOUS – SOFTWARE APPLICATION AND ACCESSIBILITY (SECTION 508 REHABILITATION ACT AND AMENDMENTS)**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. TECHNICAL DIRECTION**

The CL-COR or WACOR is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the PWS, (2) comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance.

## **VII. TRAVEL**

The contractor shall not anticipate any travel associated with this WA over the duration of the performance period.

## **VIII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

## **IX. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## **X. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

The contract QASP is applicable to this WA.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 4-96				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2020 Base                      Option Period Number       4			Title of Work Assignment/SF Site Name Reg 8 UIC Dewey-Burdock Permit				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.2, 2.3, 4.3					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2019   To   06/30/2020				
Comments: The purpose of this amendment 1 to Cadmus (EP-C-15-022) WA 4-96 is to add subtasks under Task 1 that were not completed during option period 3.										
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 640				
09/01/2015 To 06/30/2020										
This Action:						160				
Total:						800				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name    Bruce Suchomel  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 303-312-6001 FAX Number:				
Project Officer Name    Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name    Camille W. Davis  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2095 FAX Number: 513-487-2115				



## **PERFORMANCE WORK STATEMENT – Amendment 1 – July 5, 2019**

**Contract: EP-C-15-022**

**Work Assignment No. 4-96**

**Period of Performance: Issuance-6/30/19**

### **I. ADMINISTRATIVE**

**A. Title: Support for Region 8 Underground Injection Control Dewey-Burdock Permitting Actions**

**B. Work Assignment Contracting Officer's Representative:      Technical Contact:**

Bruce Suchomel  
Underground Injection Control (UIC) Unit  
USEPA Region 8  
1595 Wynkoop Street  
Mail Code: 8WP-SUI  
Denver, CO 80202-1129  
Email: [suchomel.bruce@epa.gov](mailto:suchomel.bruce@epa.gov)  
Phone: 303.312.6001  
Fax: 303.312.7517

### **C. Quality Assurance:**

This Work Assignment (WA) is a continuation of WA 3-96, which required the Contractor to develop a quality assurance project plan specific to WA 3-96 to supplement the Contract-Level Programmatic Quality Assurance Project Plan (PQAPP), dated September 3, 2015. The Contractor developed the Supplemental Quality Assurance Project Plan (SQAPP) consistent with the EPA's QA requirements. The SQAPP was approved by the Region 8 Quality Assurance Director on December 18, 2018.

Task 2 in this work assignment involves developing a response to comments received from the public notice of proposed EPA regulatory actions. This task requires quality assurance (QA) planning and documentation to ensure each comment received is included in the response-to-comments document and no comment is neglected. The QA elements for Task 2 are addressed in the SQAPP developed under WA 3-96. The project-specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0 below.

### **D. Background:**

The Underground Injection Control (UIC) Program is authorized under the Safe Drinking Water Act. The primary mission of the UIC Program is the regulation of injection wells for the protection of underground sources of drinking water (USDWs). The definition of USDW is found in UIC regulations at 40 Code of Federal Regulations (CFR) §144.3.

The Region 8 UIC Program has proposed three distinct but related actions at the Dewey-Burdock Site: a Class III draft permit authorizing injection of fluid into uranium ore zones for uranium recovery; an aquifer exemption for the uranium-bearing zones and a Class V deep well permit to dispose of treated ISR waste fluids generated at the Dewey-Burdock site. These actions are regulated under the UIC regulations found at 40 CFR parts 124, 144 and 146. UIC regulations specific to injection wells in South

Dakota are found at 40 CFR 147 Subpart QQ. In addition to the UIC permits, the site is also regulated by the Nuclear Regulatory Commission (NRC). The NRC has issued a Radioactive Materials Handling License for the site.

This WA is a continuation of previous WA 3-96, which included three tasks providing contractor support to the EPA Region 8 UIC Program (hereafter EPA) to proceed efficiently with permitting activities at the Dewey-Burdock Uranium Site. The Contractor completed Task 1 under WA 3-96; Tasks 2 and 3 had not been completed by the end of Option Period 3 and are, therefore, included in this WA. The WA 3-96 task numbers are being carried over to this WA to reflect the continuity of the work and to avoid confusion moving forward.

The Dewey-Burdock project site is located near the Black Hills in South Dakota. The Black Hills are of historic interest to many tribes. The UIC permitting actions have resulted in a lengthy, complicated tribal consultation process that began in 2013, but has not reached successful completion. The lengthy, complicated tribal consultation process has added considerable time to the UIC Dewey-Burdock permitting process. The Region 8 UIC Program is seeking contractual assistance to conduct a respectful tribal consultation process.

The Region 8 Tribal Assistance Program maintains a contact list of tribal leaders for Region 8 tribes, but does not include Tribal Historic Preservation Officers (THPOs). The Department of Housing and Urban Development (HUD) recently updated its Tribal Directory Assistance Tool (TDAT) with new information gathered from Indian tribes. TDAT is a free, web-accessible contact database that contains information about federally recognized Indian tribes and their geographic areas of current and ancestral interest at the county level. It lists names and contact information for tribal leaders and THPOs as well as links to tribal websites. Users can query the database by street address, county, state, and tribe. Information generated from TDAT can be exported in spreadsheet format for use in other programs. TDAT was designed to help users quickly identify tribes and provide appropriate tribal contact information to assist with initiating Section 106 consultation. For more information about TDAT, see the ACHP's information paper at <http://www.achp.gov/tdat.html>. TDAT can be accessed at <https://egis.hud.gov/tdat/>.

As part of the administrative record for the draft UIC permits, the Region 8 UIC Program developed fact sheets for both UIC draft permits, a draft record of decision for the aquifer exemption, a draft cumulative effects analysis document, a draft environmental justice analysis document and a draft document proposing the Region 8 UIC Program's plan for complying with Section 106 of the National Historic Preservation Act. These documents were also available for public review and comment.

The UIC permitting process requires the Region 8 UIC Program to conduct a public comment period per requirements under 40 CFR § 124.10 and issue a response-to-comments document under 40 CFR § 124.17. During the public comment period for the Dewey-Burdock site, the EPA received a large volume of comments on the proposed UIC actions and draft documents. In a previous Work Assignment (2-94) under this contract, Cadmus categorized the comments into 43 different topics.

Responses to many of the comments are found in the draft documents that were part of the administrative record. The EPA is seeking contractual support to develop a response-to-comments document based on the comment topics in the categorized comment document deliverable generated under the previous Work Assignment and the information in the draft documents that were part of the administrative record.

## II. OBJECTIVE

The purpose of this Amendment is to add subtasks under Task 1 that were not completed under the Option 3 contract period.

The objective of this Work Assignment is to obtain contractual support for the Region 8 UIC Program (hereafter EPA) to proceed efficiently with permitting activities at the Dewey-Burdock Uranium Site by:

1. Conducting literature review and technical analysis to analyze and develop criteria for a robust conceptual site model and groundwater geochemical model for all life cycles phases of the ISR process.
  - a. The geohydrologic and geochemical conceptual site model of the uranium ISR site should include all lifecycle phases of ISR operations and conditions after groundwater restoration has been completed in each wellfield and natural groundwater flow conditions have resumed at the site and
  - b. The groundwater geochemical model should encompass the geochemical changes that occurred during ISR operations to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary into the USDW downgradient from restored ISR wellfields at the permitted site.

Development of an actual conceptual site model and groundwater geochemical model is not requested as part of this Work Assignment. Only the criteria for the successful development of these models is requested. The objective of the Work Assignment will be achieved by completing the tasks and subtasks described in the following section.

2. Providing assistance in adding contact information to EPA-generated tribal consultation letters that will be mailed to approximately 23 tribes on two separate occasions;
3. Providing assistance in contacting tribal offices to identify tribes who are interested in scheduling consultation meetings with the EPA, identify the designated tribal contacts for the Dewey-Burdock consultation process and schedule consultation meetings with interested tribes; and
4. Developing a general framework for the response-to-comment document based on:
  - a. The comment topics in the categorized comment document deliverable generated under the previous Work Assignment and

The information available in the draft documents that were a part of the Dewey-Burdock administrative record.

## III. TASK DETAIL

The contract level sections that support this work assignment include: 2.2, 2.3, and 4.3.

The total LOE for this Work Assignment is: 890 hours.

The Contractor shall perform the three tasks described below as well as the administrative tasks described under Task 0.

### **Task 0: Work Plan, QA Documents and Monthly Progress Reports**

The LOE for Task 0 is: 75 hours

**Subtask 0.1:** The Contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the Contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs. The work plan shall also address the specific quality assurance requirements, as applicable.

**Subtask 0.2:** This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in this WA. All reports shall be completed and submitted in accordance with the current contract requirements.

**Task 0 Deliverables:**

1. Work Plan,
- 2 . Monthly progress and financial reports.

**Task 1:** The contractor shall analyze and develop criteria for a geohydrologic and geochemical conceptual site model and a groundwater geochemical model at a uranium ISR site for all life cycles phases of the ISR process, including after groundwater restoration has been completed in each wellfield and natural groundwater flow conditions have resumed, to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary.

As stated previously, this WA is a continuation of previous WA 3-96, which included the same three tasks. The Contractor completed most of the work for Task 1 under WA 3-96. Three remaining subtasks remain for the completion of all Task 1 deliverables. Abbreviated descriptions and the status of each subtask follow.

The LOE to complete Task 1 is: 160 hours

**Subtask 1.1:** The contractor shall conduct a review of technical literature to identify and analyze the specifications for an appropriate geohydrologic and geochemical conceptual site model.

**Status:** Completed

**Subtask 1.2:** The contractor shall develop criteria to create an appropriate geohydrologic and geochemical conceptual site model.

**Status:** Completed except for final consistency review.

**Subtask 1.3:** Develop a background document explaining the rationale behind the conceptual site model criteria.

**Status:** Completed except for final consistency review.

**Subtask 1.4:** The contractor shall conduct a review of technical literature to identify and analyze the specifications for an appropriate groundwater geochemical model.

**Subtask 1.5:** The contractor shall develop criteria to create an appropriate groundwater geochemical model to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary and identify information needed to calibrate the groundwater geochemical model.

**Status:** Completed except for final consistency review.

**Subtask 1.6:** Develop a background document explaining the rationale behind the groundwater geochemical model criteria

**Status:** This document is still under review by the EPA. After the EPA provides comments on the Subtask 1.6 document, the Contractor will address those comments to finalize the document. The Contractor will then do a consistency review to ensure terminology and descriptions of various technical concepts are consistent across the documents for Subtasks 1.2, 1.3, 1.5, 1.6 and 1.7.

**Subtask 1.7:** Develop an acceptance criteria document for the groundwater geochemical model.

**Status:** This document is still under review by the EPA. After the EPA provides comments on the Subtask 1.6 document, the Contractor will address those comments to finalize the document. The Contractor will then do a consistency review to ensure terminology and descriptions of various technical concepts are consistent across the documents for Subtasks 1.2, 1.3, 1.5, 1.6 and 1.7.

#### **Task 1 Deliverables:**

1. Annotated bibliographies of references described in Subtasks 1.1 and 1.4: Completed.

2. Criteria documents described in Subtasks 1.2 and 1.5 in word-searchable Adobe Acrobat format from which text may be copied and pasted.
3. Background documents described in Subtasks 1.3 and 1.6 in word-searchable Adobe Acrobat format and Microsoft Word format.
4. Acceptance criteria document described in Subtask 1.7 in word-searchable Adobe Acrobat format and Microsoft Word format.

**Task 2: Administrative support with tribal consultation tasks**

The LOE for Task 2 is: 160 hours.

**Subtask 2.1: Generate the tribal contact list.**

1. The Contractor shall generate an up-to-date tribal contact list for the list of tribes supplied by the EPA per #4 above. The up-to-date list will be based on the contact list from the previous tribal consultation letter the EPA mailed in November 2015. The tribal contacts will most likely have changed since that time, so the Contractor shall verify the names of the current Tribal Historic Preservation Officers or preservation contact and the current tribal leader (chairman or president). The EPA will provide a list of contacts for tribes located in Region 8, however, there are tribes on the mailing list outside of Region 8, for which it will be necessary to verify the current contacts.
2. The contact information shall include the names, mailing addresses, phone numbers and email addresses for the tribal leaders and the names, phone numbers and email addresses for the tribal environmental directors and the THPOs.
3. A copy of the contact list shall also be provided to the EPA in MS Word format. Ideally, the contact list is saved on a SharePoint or ftp site, made available to the EPA, and set up to send automatic emails to the Work Assignment Manager and the Technical Contract when the list is updated.
4. The names and addresses of the tribal leaders shall also be included in a file format appropriate for the Contractor use to perform a mail merge with the template tribal consultation letter.

**Subtask 2.2: Prepare a tribal consultation letter for each tribe on the mailing list from a template letter provided by the EPA.**

1. The Contractor shall generate the individual tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. The Contractor shall send the EPA an MS Word file containing the letters ready for printing and signature.

**Subtask 2.3 Email the pdfs of the signed letters and save emails to pdf files.**

1. After signature, the EPA will scan all the signed letters to pdf files and email them back to the Contractor along with enclosures.
2. The Contractor shall email the letters and enclosures to the tribal leaders and include the environmental directors and THPOs in the “courtesy copy” address line.
3. The contractor shall save the emails as pdf files and make the pdf files available to the EPA to add to the administrative record.

**Subtask 2.4: Forward any emails from tribes to the EPA and save the emails as pdf files.**

1. If any tribe sends an email, the Contractor shall immediately forward the email to the EPA Work Assignment COR and copy the Technical Contact.
2. Each email from a tribe shall be saved as a pdf file and made available to the EPA.

**Subtask 2.5: Ongoing list of all communication with tribes.**

1. The Contractor shall maintain an ongoing list of all communication with tribes, including:
  - a. name of tribe,
  - b. name of person,
  - c. date of communication,
  - d. indicate whether communication is by call, voice message or email and
  - e. a brief note on the content of the communication.
2. The Contractor shall make available to the EPA updated lists of recent communication. The EPA's preference would be a list saved on a SharePoint or ftp site accessible by the EPA. The contractor shall either send, or set up automatically generated, emails to the EPA Work Assignment COR when the list is updated.

**Subtask 2.6: Identify tribes interested in consultation with the EPA and identify designated tribal contacts.**

After 10 business days from emailing the consultation letters to the tribal contacts, the Contractor shall call the tribal offices that have not already replied to the emailed letters. The purpose of the call is to:

1. Determine if the tribe wishes to schedule a consultation meeting with the EPA and
2. If so, identify the designated tribal contact for the Dewey-Burdock consultation process. The EPA has already identified the designated tribal contact for the Cheyenne River Sioux Tribe; however, this contact should be confirmed by the Contractor.

**Subtask 2.7: Refer questions and comments to the EPA as appropriate.**

If the tribal office or a tribal contact has any questions that the Contractor is unable to answer or comments the Contractor finds it inappropriate to provide a response to, the Contractor shall

1. Refer the person to the EPA Technical Contact,
2. Notify the EPA Work Assignment COR and Technical Contact and
3. Include the question or comment in the notification.

**Subtask 2.8: Schedule tribal consultation meetings.**

1. After the Contractor has identified the tribes that are interested in scheduling a tribal consultation meeting and the designated tribal contact, the contractor shall begin the process of scheduling consultation meetings.
2. The EPA Technical Contact will provide updated lists dates and times of availability for the Contractor to offer to the tribes to schedule meetings.
3. The Contractor shall call or email the designated tribal contact and offer the available times for scheduling meetings.
4. If a call is made, the Contractor shall send a follow-up email message containing the same information as was conveyed during the call. The email message shall refer to the call or voicemail message left with the tribe.
5. Once a tribe schedules a consultation meeting, the Contractor shall immediately email the EPA Work Assignment COR and copy the Technical Contact so they may begin travel arrangements.



6. The Contractor shall include all communication under this Subtask in the communication list described in Subtask 2.5 and handle any emails received from tribes as described in Subtask 2.4.
7. The EPA anticipates this task will continue until 6 weeks before the issue date of the final permit decision. The Work Assignment COR will notify the Contractor of this date.

**Subtask 2.9: Prepare a final tribal consultation letter for each tribe on the mailing list from a template final tribal consultation letter provided by the EPA**

When the EPA has determined that the opportunity for tribal consultation is drawing to a close, the EPA Work Assignment COR will email the Contractor the following documents:

1. The template final tribal consultation letter as a MS Word file,
2. A list of tribes that will receive the consultation letter, and
3. An updated Region 8 tribal contact list.

The Contractor shall:

1. Generate the individual final tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. Send the EPA an MS Word file containing the letters ready for printing and signature.

**Subtask 2.10 Email the pdfs of the signed letters and attachments and save emails to pdf files.**

1. After signature, the EPA will scan all the signed letters to pdf files and email them back to the Contractor along with enclosures.
2. The Contractor shall email the letters and enclosures to the tribal leaders and include the environmental directors and THPOs in the courtesy copies address box.
3. The contractor shall save the emails as pdf files and make the pdf files available to the EPA to add to the administrative record.
4. The Contractor shall handle any emails received from tribes as described in Subtask 2.4.

**Subtask 2.11: Follow-up calls to tribes to confirm receipt of the final consultation letter.**

1. After 5 business days from emailing the final consultation letters to the tribal contacts, the Contractor shall contact the tribal offices to:
  - a. Confirm that the tribal leader has received the final consultation letter and
  - b. Offer one last opportunity to schedule a consultation meeting.
2. The Contractor shall handle any emails received from tribes as described in Subtask 2.4 and include all communication under this Subtask in the communication list described in Subtask 2.5.

**Task 2 Deliverables:**

1. The final tribal contact list containing contact information for each tribal leader, the tribal environmental director and THPO for each tribe on the mailing list provided by EPA.
2. An MS Word file of the tribal consultation letters ready for the EPA to print and route for signature.
3. Email pdf files of the signed consultation letters and attachments (received from the EPA) to each tribal leader, including the tribal environmental director and THPO as courtesy copies, and save each email as a pdf file.



4. Forward all emails from tribes to the EPA, save the emails as pdf files and make the pdf files available to the EPA.
5. An ongoing list of communication with tribes including the information indicated in Subtask 2.5; make the list available to the EPA.
6. A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed; make the list available to the EPA.
7. Notification to the EPA of any questions or comments from a tribe the Contractor deems appropriate to refer to the EPA.
8. Immediate notification to the EPA when a tribe schedules a consultation meeting.
9. An MS Word file of the final consultation letters ready for the EPA to print and route for signature.
10. Email pdf files of the signed final consultation letters and attachments (received from the EPA) to each tribal leader, including the tribal environmental director and THPO as courtesy copies, and save each email as a pdf file.
11. Follow-up calls to tribes after emailing the final consultation letter.

**Task 3: Development of the Response-to-Comments Document for the Region 8 Underground Injection Control Permitting Actions at the Dewey-Burdock Uranium In-Situ Recovery Site**

The LOE for Task 3 is: 405 hours.

**Subtask 3.1: Review of documents provided by the EPA and identify responses to comments that are available in these documents.**

Upon the initiation of previous WA 3-96, the EPA sent the Contractor via email the following document on November 27, 2018:

1. The document containing the public comments received categorized under the 43 topics, which was a deliverable from Contract EP-C-15-022 Work Assignment 2-94
2. The UIC Class III draft permit and fact sheet,
3. The UIC Class V draft permit and fact sheet,
4. The proposed aquifer exemption Record of Decision,
5. The draft cumulative effects analysis document,
6. The draft environmental justice analysis document,
7. The draft document proposing the EPA's plan for complying with Section 106 of the National Historic Preservation Act, and

**Subtask 3.2: Develop a framework document for the response to comments.**

The Contractor shall write a brief introduction to each comment topic identified in the categorized comment document. The introduction should summarize the full scope of concepts included in the comments.

During this process, the contractor may determine it is appropriate to combine similar comment topics or further split out comments previously grouped under a single topic.

The Contractor shall add two new categories: 1) *Comments related to NEPA* and 2) *Comments related to the Endangered Species Act*. The contractor shall identify comments related to these two new topics that were included under Comment category #38, *Comments about other government agencies or regulatory*

programs (NEPA, the Clean Air Act, the Nuclear Regulatory Commission, etc.) and include them under the two new topics as appropriate.

Comment category #1 contains comments that stated general opposition to the Dewey-Burdock project but did not include specific information applicable to the UIC Program. This lack of specific information prevents the UIC program from generating a response to these comments. This comment category should be included near the end of the document and before the topics included in Table 1 below.

Comment category #42, *Comments about Crow Butte*, will be addressed by EPA Region 7. This category should be placed before comment category #1.

The comment topics included in Table 1 are beyond the scope of the UIC Program regulatory authority and no UIC regulations or permit requirements apply to these topics. These comment topics should be grouped under a section of the document with the heading “Comments on Issues outside the Scope of UIC Program Regulatory Authority” and included at the end of the document.

**Table 1. Comments outside the scope of the UIC program.**

Category No.	Comment Category Title
12	Concerns about hydraulic fracturing.
16	Against uranium mining in general.
17	Against uranium mining because of problems with nuclear power generation and nuclear weapons.
18	Concerns about the price of uranium, future demand for uranium and future viability of nuclear energy.
19	Concerns about effects of past uranium mining.
20	Concerns about Azarga (e.g. integrity of investors, integrity of company itself, solvency, experience in the ISR industry, etc.).
35	Concerns the project will not benefit Edgemont, South Dakota Counties, the State of South Dakota or the USA.
36	Comment topic unrelated to the UIC draft permits & aquifer exemption.
37	Any additional topics not included in the above list.
39	Comments about the cost or technical feasibility of treating/remediation of contaminated groundwater

**Subtask 3.3: Include responses to comments that are addressed in the draft documents the EPA developed for the administrative record.**

Many of the comments the EPA received are already addressed in the documents the EPA prepared for the administrative record. These documents are listed under Subtask 3.1.

The Contractor shall include responses to comments as addressed by the information in these documents.

After these responses are included, there may be additional concepts expressed in the comments that were not fully addressed by the information in the draft documents. There may be comment topics that are not addressed by any information in the draft documents. The Contractor shall flag these areas to identify the concepts or comment topics not fully addressed by the available information. The EPA will complete the response-to-comments document and address any remaining concepts and comments.

#### IV. SCHEDULE OF DELIVERABLES:

**Table 2. List of Deliverables and Due Dates**

No.	DELIVERABLE	DATE DUE TO EPA
<b>Task 0: Work Plan and Monthly Progress Reports</b>		
0.1	Work plan and budget	According to contract
0.2	Monthly progress and financial reports	Monthly
<b>Task 1: Conceptual Site Model and Groundwater Geochemical Model</b>		
	Conference call/web conference to discuss progress	Completed
1.1	Annotated bibliography for the conceptual site model in searchable Adobe Acrobat format	Completed
1.2	The criteria document for the conceptual site model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.
1.3	Background document for the conceptual site model criteria in word-searchable Adobe Acrobat format and Microsoft Word format.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.
	Final versions of deliverables 1.1, 1.2 and 1.3 addressing comments from the EPA.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.
	Conference call/web conference to discuss progress	Completed
1.4	Annotated bibliography for the groundwater geochemical model in searchable Adobe Acrobat format.	Completed.
1.5	The criteria document for the groundwater geochemical model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.
1.6	Background document for the groundwater geochemical model criteria in word-searchable Adobe Acrobat format and Microsoft Word format	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents
1.7	Acceptance criteria document for the groundwater geochemical model in word-searchable Adobe Acrobat format and Microsoft Word format	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.
	Final versions of deliverables 1.4, 1.5, 1.6 and 1.7 addressing comments from the EPA.	Within 20 business days after receiving comments from the EPA on all final Task 1 documents.

**Table 2. List of Deliverables and Due Dates – continued**

<b>Task 2: Support with Tribal Consultation Administrative Tasks</b>		
2.1	The final tribal contact list containing contact information for each tribal leader, the tribal environmental director and THPO for each tribe on the mailing list provided by EPA.	Within 3 business days after receiving the tribal mailing list from the EPA
2.2	An MS Word file of the tribal consultation letters ready for the EPA to print and route for signature.	Within 3 business days after finalizing the tribal contact list.
2.3	Email pdf files of the signed consultation letters and attachments (received from the EPA) to each tribal leader, courtesy copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files of the from the EPA.

<b>2.4</b>	Forward all emails from tribes to the EPA, save the emails as pdf files and make the pdf files available to the EPA.	Forward emails to the EPA within 1 business day of receiving the email from a tribe.
<b>2.5</b>	An ongoing list of communication with tribes including the information indicated in Subtask 2.5; make the list available to the EPA.	Update list within 1 business day of the communication event.
<b>2.6</b>	A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed; make the list available to the EPA.	Update list within 1 business day of receiving information from tribe.
<b>2.7</b>	Notification to the EPA of any questions or comments from a tribe the Contractor deems appropriate to refer to the EPA.	Within 1 business day of the referral.
<b>2.8</b>	Immediate notification to the EPA when a tribe schedules a consultation meeting.	The same day of hearing from the tribe, if possible.
<b>2.9</b>	An MS Word file of the final consultation letters ready for the EPA to print and route for signature.	Within 3 business days after receiving the tribal mailing list from the EPA
<b>2.10</b>	Email pdf files of the signed final consultation letters and attachments (received from the EPA) to each tribal leader, copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files of the scanned signed letters from the EPA.
<b>2.11</b>	Follow-up calls to tribes after emailing the final consultation letter.	Begin calls after 5 business days of emailing the final consultation letter, completing the task within 10 business days of emailing the final consultation letter.



**Table 2. List of Deliverables and Due Dates – continued**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>Task 3: The Response-to-Comments Document</b>		
<b>3.1</b>	An MS Word document containing introductions to comment topics with areas flagged for the EPA where the responses to some comments or comment concepts were not addressed by the information provided in the draft documents.	Within 55 business days after receiving the documents listed under Subtask 3.1 from the EPA.
<b>3.2</b>	Any QA documentation generated while tracking comments under the appropriate response section in the Response-to-Comments document, as applicable.	At the time deliverable 3.1 is submitted.

## **V. MISCELLANEOUS – SOFTWARE APPLICATION AND ACCESSIBILITY (SECTION 508 REHABILITATION ACT AND AMENDMENTS)**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. TECHNICAL DIRECTION**

The CL-COR or WACOR is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the PWS, (2) comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance.

## **VII. TRAVEL**

The contractor shall not anticipate any travel associated with this WA over the duration of the performance period.

## **VIII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

## **IX. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## **X. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

The contract QASP is applicable to this WA.